



Our Vision  Clean Air

**Santa Barbara County  
Air Pollution Control District**

*2.2.9  
2.7.2.1*

MAR 09 2009

Certified Mail 7008 1140 0005 0037 8277  
Return Receipt Requested

Christine White  
DCOR, LLC.  
290 Maple Court, Suite 290  
Ventura, CA 93003

FID: 08003, 08004, 08005, 08006,  
08007  
Permit: P7R 09110 - R3,  
P7R 09111 - R3,  
P7R 09112 - R3,  
P7R 09113 - R3,  
P7R 09114 - R3  
SSID: 08003

Re: Final Renewal of Part 70 Permit Renewal / Reevaluation 09110 - R3 (Platform A), 09111 - R3 (Platform B), 09112 - R3 (Platform C), 09113 - R3 (Platform Henry), 09114 - R3 (Platform Hillhouse)

Dear Ms. White:

Enclosed is the final Part 70 Permit Renewal / Reevaluation (PT-70/Reeval) Nos. 09110 - R3 through 09114-R3 for the Dos Cuadras – South County Stationary Source.

The Part 70 permits expire in March, 2012. A complete application to renew the Part 70 Operating Permits must be submitted to our office consistent with the requirements of APCD Regulation XIII.

The APCD PTO's for the OCS platforms also comprise the triennial (every three years) reevaluation of existing air quality permits at your facility, as required by Air Pollution Control District ("APCD") Rule 210. The permits may contain new conditions added to ensure compliance with current laws and updated regulations.

Please carefully review the enclosed documents to ensure that they accurately describe your facility and that the conditions are acceptable to you. Note that your permitted emission limits may, in the future, be used to determine emission fees.

You should become familiar with all APCD rules pertaining to your facility. This permit does not relieve you of any requirements to obtain authority or permits from other governmental agencies.

This permit requires you to:

- Follow the conditions listed on your permit. Pay careful attention to the recordkeeping and reporting requirements.

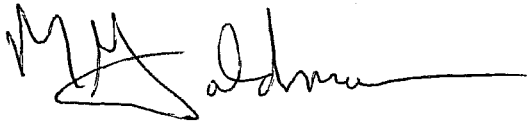
**Terry Dressler • Air Pollution Control Officer**  
260 North San Antonio Road, Suite A • Santa Barbara, CA • 93110 • [www.sbapcd.org](http://www.sbapcd.org) • 805.961.8800 •  
805.961.8801 (fax)

- Ensure that a copy of the enclosed permit is posted or kept readily available near the permitted equipment.
- Promptly report changes in ownership, operator, or your mailing address to the APCD.

If you are not satisfied with the conditions of this permit, **you have thirty (30) days from the date of this issuance to appeal this permit to the Air Pollution Control District Hearing Board** (ref: California Health and Safety Code, §42302.1). Any contact with APCD staff to discuss the terms of this permit will not stop or alter the 30-day appeal period.

Please include the facility identification (FID) and permit numbers as shown at the top of this letter on all correspondence regarding this permit. If you have any questions, please contact Kaitlin Ergun of my staff at (805) 961-8855.

Sincerely,



Michael Goldman, Manager  
Engineering & Compliance Division

enc: Final PT-70/Reeval 09110 - R3  
Final PT-70/Reeval 09111 - R3  
Final PT-70/Reeval 09112 - R3  
Final PT-70/Reeval 09113 - R3  
Final PT-70/Reeval 09114 - R3

cc: Platform A 08003 Project File SC  
Platform B 08004 Project File SC  
Platform C 08006 Project File SC  
Platform Henry 08007 Project File SC  
Platform Hillhouse 08005 Project File SC  
ECD Chron File  
Michael D. Broughton (Cover letter only)  
Kaitlin Ergun (Cover letter only)



**FINAL**

**PERMIT to OPERATE No. 9111 – R3  
and  
PART 70 OPERATING PERMIT**

**DOS CUADRAS - SOUTH COUNTY  
PLATFORM B**

**PARCEL OCS-P-0241  
DOS CUADRAS FIELD  
SANTA BARBARA COUNTY, CALIFORNIA  
OUTER CONTINENTAL SHELF**

**OPERATOR**

**Dos Cuadras Offshore Resources, LLC. (“DCOR”)**

**OWNERSHIP**

**Dos Cuadras Offshore Resources, LLC  
Venoco**

**Santa Barbara County  
Air Pollution Control District  
March 9, 2009**

-- This page intentionally left blank --

## TABLE OF CONTENTS

<b><u>SECTION</u></b>	<b><u>PAGE</u></b>
<b>1.0 INTRODUCTION.....</b>	<b>1</b>
1.1 PURPOSE.....	1
1.2 FACILITY OVERVIEW .....	1
1.3 EMISSION SOURCES .....	4
1.4 EMISSION CONTROL OVERVIEW .....	5
1.5 OFFSETS/EMISSION REDUCTION CREDIT OVERVIEW.....	5
1.6 PART 70 OPERATING PERMIT OVERVIEW.....	5
<b>2.0 PROCESS DESCRIPTION.....</b>	<b>8</b>
2.1 PROCESS SUMMARY .....	8
2.2 SUPPORT SYSTEMS .....	13
2.3 DRILLING ACTIVITIES .....	14
2.4 MAINTENANCE/DEGREASING ACTIVITIES .....	14
2.5 PLANNED PROCESS TURNAROUNDS.....	14
2.6 OTHER PROCESSES .....	14
2.7 DETAILED PROCESS EQUIPMENT LISTING .....	15
<b>3.0 REGULATORY REVIEW.....</b>	<b>16</b>
3.1 RULE EXEMPTIONS CLAIMED .....	16
3.2 COMPLIANCE WITH APPLICABLE FEDERAL RULES AND REGULATIONS .....	17
3.3 COMPLIANCE WITH APPLICABLE STATE RULES AND REGULATIONS .....	18
3.4 COMPLIANCE WITH APPLICABLE LOCAL RULES AND REGULATIONS .....	18
3.5 COMPLIANCE HISTORY .....	22
<b>4.0 ENGINEERING ANALYSIS.....</b>	<b>29</b>
4.1 GENERAL.....	29
4.2 STATIONARY COMBUSTION SOURCES .....	29
4.3 FUGITIVE HYDROCARBON SOURCES.....	31
4.4 CREW AND SUPPLY VESSELS .....	32
4.5 TANKS/VESSELS/SUMPS/SEPARATORS .....	33
4.6 VAPOR RECOVERY SYSTEMS.....	35
4.7 HELICOPTERS .....	35
4.8 OTHER EMISSION SOURCES .....	35
4.9 BACT/NSPS/NESHAP/MACT.....	36
4.10 CEMS/PROCESS MONITORING/CAM .....	36
4.11 SOURCE TESTING/SAMPLING .....	37
5.1 GENERAL.....	40
5.2 PERMITTED EMISSION LIMITS - EMISSION UNITS .....	40
5.3 PERMITTED EMISSION LIMITS - FACILITY TOTALS .....	41
5.4 PART 70: FEDERAL POTENTIAL TO EMIT FOR THE FACILITY.....	42
5.5 EXEMPT EMISSION SOURCES/PART 70 INSIGNIFICANT EMISSIONS .....	42
5.6 NET EMISSIONS INCREASE CALCULATION .....	43
<b>6.0 AIR QUALITY IMPACT ANALYSES.....</b>	<b>53</b>
6.1 MODELING.....	53
6.2 INCREMENTS .....	53
6.3 MONITORING .....	53

6.4	HEALTH RISK ASSESSMENT .....	53
<b>7.0</b>	<b>CAP CONSISTENCY, OFFSET REQUIREMENTS AND ERCS.....</b>	<b>54</b>
7.1	GENERAL.....	54
7.2	CLEAN AIR PLAN.....	54
7.3	OFFSET REQUIREMENTS .....	54
7.4	EMISSION REDUCTION CREDITS.....	54
<b>8.0</b>	<b>LEAD AGENCY PERMIT CONSISTENCY .....</b>	<b>55</b>
<b>9.0</b>	<b>PERMIT CONDITIONS .....</b>	<b>56</b>
9.A	STANDARD ADMINISTRATIVE CONDITIONS.....	56
9.B.	GENERIC CONDITIONS .....	61
9.C	EQUIPMENT SPECIFIC CONDITIONS .....	65
<b>10.0</b>	<b>ATTACHMENTS .....</b>	<b>1</b>
10.1	EMISSION CALCULATION DOCUMENTATION .....	1
10.2	FEE CALCULATIONS.....	1
10.3	IDS DATABASE EMISSION TABLES .....	1
10.4	EQUIPMENT LIST.....	1
10.5	EXEMPT BUT SIGNIFICANT EQUIPMENT LIST.....	1
10.6	EXEMPT AND INSIGNIFICANT EQUIPMENT LIST .....	1
10.7	DE-PERMITTED EQUIPMENT LIST .....	1
10.8	COMMENTS ON DRAFT PERMIT.....	1

## **LIST OF FIGURES and TABLES**

**TABLE/  
FIGURE**

**PAGE**

FIGURE 1.1 - LOCATION MAP FOR PLATFORM A .....	2
TABLE 3.1 - GENERIC FEDERALLY-ENFORCEABLE APCD RULES .....	24
TABLE 3.2 - UNIT-SPECIFIC FEDERALLY ENFORCEABLE APCD RULES .....	25
TABLE 3.3 - NON-FEDERALLY ENFORCEABLE APCD RULES .....	26
TABLE 3.4 - ADOPTION DATES OF APCD RULES APPLICABLE AT ISSUANCE OF PERMIT .....	27
TABLE 4.1 - BEST AVAILABLE CONTROL TECHNOLOGY .....	38
TABLE 4.2 – PROCESS STREAM SAMPLING REQUIREMENTS .....	38
TABLE 4.3 – SOURCE TEST REQUIREMENTS .....	39
TABLE 5.1-1 - OPERATING EQUIPMENT DESCRIPTION .....	45
TABLE 5.1-2 - EQUIPMENT EMISSION FACTORS .....	46
TABLE 5.1-3 - EMISSION LIMITS BY EMISSION UNIT – SHORT TERM LIMITS .....	47
TABLE 5.1-4 - EMISSION LIMITS BY EMISSION UNIT – LONG TERM LIMITS .....	48
TABLE 5.2 - TOTAL PERMITTED FACILITY EMISSIONS .....	49
TABLE 5.3 - FEDERAL POTENTIAL TO EMIT .....	50
TABLE 5.4 - ESTIMATED PERMIT EXEMPT EMISSIONS .....	51
TABLE 5.5 - NET EMISSIONS INCREASE .....	52

## **ABBREVIATIONS/ACRONYMS**

AP-42	USEPA's <i>Compilation of Emission Factors</i>
APCD	Santa Barbara County Air Pollution Control District
API	American Petroleum Institute
ASTM	American Society for Testing Materials
BACT	Best Available Control Technology
CAM	compliance assurance monitoring
CEMS	continuous emissions monitoring
CO	carbon monoxide
dscf	dry standard cubic foot
°F	degree Fahrenheit
gal	gallon
gr	grain
HAP	hazardous air pollutant (as defined by CAAA, Section 112(b))
H <sub>2</sub> S	hydrogen sulfide
I&M	inspection & maintenance
k	kilo (thousand)
l	liter
lb	pound
lbs/day	pounds per day
lbs/hr	pounds per hour
LACT	Lease Automatic Custody Transfer
LPG	liquid petroleum gas
M	mille (thousand)
MACT	Maximum Achievable Control Technology
MM	million
MW	molecular weigh
NEI	net emissions increase
NG	natural gas
NO <sub>x</sub>	Oxides of nitrogen
NSPS	New Source Performance Standards
NESHAP	National Emission Standards for Hazardous Pollutants
O <sub>2</sub>	oxygen
OCS	outer continental shelf
ppm(vd or w)	parts per million (volume dry or weight)
psia	pounds per square inch absolute
psig	pounds per square inch gauge
PM/PM <sub>10</sub>	Particulate matter; Particulate matter of 10 microns or less diameter
PRD	pressure relief device
PTO	Permit to Operate
RACT	Reasonably Available Control Technology
ROC	reactive organic compounds, same as "VOC" as used in this permit
RVP	Reid vapor pressure
scf	standard cubic foot
scfd (or scfm)	standard cubic feet per day (or per minute)
SIP	State Implementation Plan
SO <sub>x</sub>	Sulfur oxides
STP	standard temperature (60°F) and pressure (29.92 inches of mercury)
THC	Total hydrocarbons
tpy, TPY	tons per year
TVP	true vapor pressure
USEPA	United States Environmental Protection Agency
VE	visible emissions
VRS	vapor recovery system



## 1.0 Introduction

### 1.1 Purpose

General. The Santa Barbara County Air Pollution Control District (APCD) is responsible for implementing all applicable federal, state and local air pollution requirements which affect any stationary source of air pollution in Santa Barbara County. The County is designated as an ozone nonattainment area for the 8-hour average state ambient air quality standard. The County is also designated a nonattainment area for the state PM<sub>10</sub> ambient air quality standard. The federal requirements include regulations listed in the Code of Federal Regulations: 40 CFR Parts 50, 51, 52, 55, 61, 63, 68, 70 and 82. The State regulations may be found in the California Health & Safety Code, Division 26, Section 39000 et seq. The applicable local regulations can be found in the APCD's Rules and Regulations. This is a combined permitting action that covers both the Federal Part 70 permit (*Part 70 Operating Permit No. 9111*) as well as the State Operating Permit (*Permit to Operate No. 9111*).

Part 70 Permitting. This is the *third* renewal of the DCOR OCS Platform B's Part 70 operating permit based on the permit renewal requirements of the APCD's Part 70 operating permit program. It contains any new applicable requirements and all equipment changes since the last Part 70 permit issuance. Platform B is a part of the *Dos Cuadras - South County* stationary source (SSID = 8003), which is a major source for VOC<sup>1</sup>, NO<sub>x</sub> and CO. Conditions listed in this permit are based on federal, state or local rules and requirements. Sections 9.A, 9.B and 9.C of this permit are enforceable by the APCD, the USEPA and the public since these sections are federally enforceable under Part 70. Where any reference contained in Sections 9.A, 9.B or 9.C refers to any other part of this permit, that part of the permit referred to is federally enforceable. Conditions listed in Section 9.D are "APCD-only" enforceable.

Pursuant to the stated aims of Title V of the CAAA of 1990 (i.e., the Part 70 operating permit program), this permit has been designed to meet two objectives. First, compliance with all conditions in this permit would ensure compliance with all federally enforceable requirements for the facility. Second, the permit would be a comprehensive document to be used as a reference by DCOR, the regulatory agencies and the public to assess compliance.

### 1.2 Facility Overview

- 1.2.1 Facility Overview: Dos Cuadras Offshore Resources, LLC. ("DCOR") is the principal owner and operator of Platform B, located on offshore lease tract OCS-P-0241, approximately six miles south-southeast from the City of Santa Barbara, California (Lambert Zone coordinates x = 982,134 feet, y = 804,478 feet). Platform B is owned by the following groups: DCOR 75% and Venoco, U.S.A 25%. For APCD regulatory purposes, the facility location is in the Southern Zone of Santa Barbara County<sup>2</sup>. Figure 1.1 shows the relative location of the facility within the county.

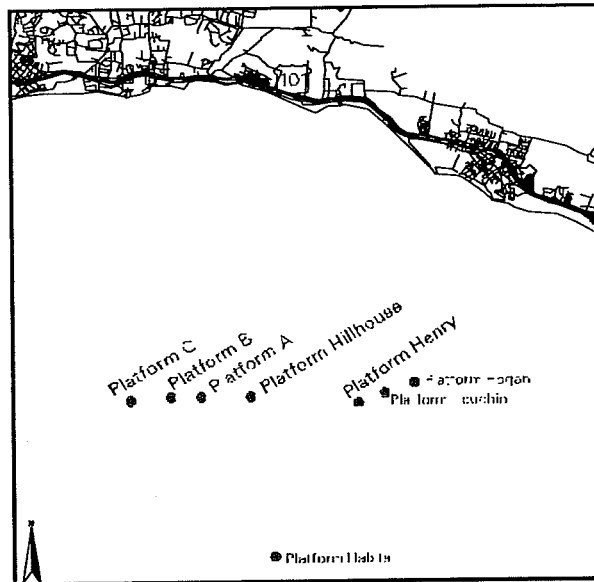
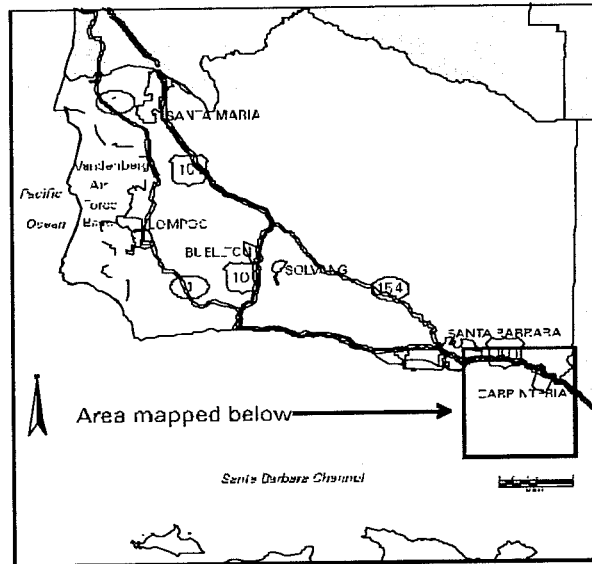
---

<sup>1</sup> VOC as defined in Regulation XIII has the same meaning as reactive organic compounds as defined in Rule 102. The term ROC shall be used throughout the remainder of this document, but where used in the context of the Part 70 regulation, the reader shall interpret the term as VOC.

<sup>2</sup> APCD Rule 102, Definition: "Southern Zone"

**Figure 1.1 Location Map for Platform B**

**Dos Cuadras - South County**



Platform B (FID # 8004), a twelve leg, sixty-three well slot platform, was installed in a water depth of 190 feet in 1969; drilling operations began in 1970. Oil and natural gas produced from the platform are transported via two sub-sea pipelines to the Rincon Oil & Gas Plant in Ventura County for final processing. The average gravity and true vapor pressure of the produced crude oil in 2007 was 23.2° API and 2.3 psia (at 92° F), respectively. The platform was initially designed to produce 15 million standard cubic feet per day (MMscfd) of gas and 38,000 barrels per day (bpd) of wet crude oil (oil/water emulsion); in 2007, the platform's approximate production rates were 2.34 MMscfd of gas, 1,193 bpd of net oil and 26,050 bpd of wastewater.

The *Dos Cuadras - South County* stationary source consists of the following 5 facilities:

- Platform A (FID=8003)
- Platform B (FID=8004)
- Platform C (FID=8006)
- Platform Hillhouse (FID=8005)
- Platform Henry (FID=8007)

Platform B consists of the following systems:

- Production wellhead and subsurface system
- Well cleanup system
- Test separation system
- Oil shipping, metering, and pipeline system
- Produced water system
- Low pressure compression system
- Gas compression system
- Gas shipping and metering system
- Electrical system
- Safety system
- Flare relief system

The oil and gas undergo initial separation to reduce water and sediment content prior to being shipped to the Rincon facility. All equipment on Platform B, except the two pedestal cranes and an emergency electrical generator, are powered by the SCE electric grid provided through a 34.5 kV sub-sea cable from shore.

- 1.2.2 Facility New Source Review Overview: Since the issuance of the initial OCS operating permit on 4 September 1994, there have been six NSR permit actions along with five administrative permit actions and one operating permit revision. These are:

*PTO Mod 9111-1*: An administrative modification was performed to correct permit errors regarding allowable solvent use. This permit was issued on 11/15/95.

*Change of Ownership 9111-01/02*: Two ownership change notices were approved. The first one was filed on 4/15/96 changing ownership from Unocal to Torch; and, the second one was filed on 4/21/97 changing ownership from Torch to Nuevo (*Torch remained temporarily as operator*).

*ATC/PTO Mod 9111-2:* This permit added condition No. 34 (Crew and Supply Boat Stationary Source Maximum Permitted Emissions and Operational Limits). The purpose was to redefine the stationary source's annual potential to emit, which is used to determine fees for Air Quality Plans, pursuant to Rule 210. This permit was issued on 5/2/96.

*ATC 9889, PTO 9889:* This NSR action allowed an increase in the oil/emulsion throughput from 30,000 bpd to 38,000 bpd. It also resulted in a net emission increase for ROC. This permit was issued on 5/14/97.

*ATC/PTO 10089:* This permit authorized the replacement of the supply boat that serves OCS Platform B. There is no Net Emissions Increase associated with this project because the total emissions from the supply boat decrease. This permit was issued on 3/30/99.

*ATC/PTO 10139:* This permit authorized a change in the pigging frequency at Platform B, and revised the allowable boat fuel use. This permit was issued on 11/30/99.

*Change of Partial Ownership 9111-03:* A partial ownership change was approved in January 2002 transferring 25 percent partial ownership from Aera Energy to Dos Cuadras Offshore Resources LLC.

*Minor Revision to APCD/Part 70 PTO 9111-07:* This minor revision incorporated the 'Man Overboard' (MOB) vessel IC engine with the rest of the permitted equipment on the platform. Since the MOB vessel has always been located at the platform as an emergency vessel, the IC engine is not a new piece of equipment; therefore, this action did not trigger an NSR. The permitting action was completed in July 2002.

*ATC/PTO 11248:* This permit authorized a change in the process sampling plan requirements and clarified the uses for the crew and supply boats. This permit was issued on 3/28/05.

*ATC/PTO 11441:* This permit authorized a change in the NOx emission limit for supply boats. This permit was issued on 3/30/05.

*Change of Operator 9111-09:* An operator change was approved on 4/25/05 transferring the operator from PXP to DCOR.

### **1.3 Emission Sources**

Air pollution emissions from Platform B are the result of combustion sources, storage tanks and piping components, such as valves and flanges. Section 4 of the permit provides the APCD's engineering analysis of these emission sources. Section 5 of the permit describes the allowable emissions from each permitted emissions unit, the platform as a whole; it also lists the potential emissions from non-permitted emission units. The emission sources include:

1. Crew boats used for personnel and cargo to and from the platform.
2. Supply boats to transport equipment, fuel and supplies to and from the platform.
3. One 25-ton pedestal crane operated by a diesel internal combustion engine.
4. One 15-ton pedestal crane operated by a diesel internal combustion engine.

5. One standby diesel-fired generator that is operated in emergency situations and tested weekly.
6. Piping components, produced water tanks, and other evaporative sources that release fugitive hydrocarbons into the atmosphere.
7. Fugitive hydrocarbons emitted into the atmosphere from pigging and from solvent use.
8. Flare relief system to combust hydrocarbon gases.

A list of all permitted equipment is provided in Section 10.4.

## **1.4 Emission Control Overview**

Air quality emission controls are utilized on Platform B for a number of emission units to reduce air pollution emissions. Additionally, the use of onshore utility grid power allows Platform B to operate without large gas turbine-powered generators or compressors. The emission controls employed on the platform include:

- A Fugitive Hydrocarbon Inspection & Maintenance (I&M) program for detecting and repairing leaks of hydrocarbons from piping components, consistent with the requirements of Rule 331, to reduce ROC emissions by approximately 80 percent.
- Use of turbo-charging, inter-cooling and a cleaner burning engine with computer-controlled injectors on supply boat main engines to achieve a NO<sub>x</sub> emissions rate of 5.99 g/bhp-hr.
- Use of turbo-charging, inter-cooling, and 4° injection timing retard on the crew boat main engines to achieve a NO<sub>x</sub> emissions rate of 8.4 g/bhp-hr, or 797 ppmv at 15% O<sub>2</sub>.
- Use of Type "B" diesel fuel injectors on both the 15-ton and 25-ton pedestal crane engines; this allows the *North Crane engine (25-ton)* to achieve NO<sub>x</sub> emissions consistent with the Rule 333 limit.
- Use of a flare relief system to combust waste hydrocarbon gases that would otherwise be released directly to the atmosphere.

## **1.5 Offsets/Emission Reduction Credit Overview**

This facility does not require emission offsets nor does it provide emission reduction credits.

## **1.6 Part 70 Operating Permit Overview**

- 1.6.1. Federally-enforceable Requirements: All federally enforceable requirements are listed in 40 CFR Part 70.2 (*Definitions*) under "applicable requirements." These include all SIP-approved APCD Rules, all conditions in the APCD-issued Authority to Construct permits and all conditions applicable to major sources under federally promulgated rules and regulations. All permits (and conditions therein) issued pursuant to the OCS Air Regulation are federally enforceable. All these requirements are also enforceable by the public under CAAA. (*see Tables 3.1 and 3.2 for a list of federally enforceable requirements*).

- 1.6.2. Insignificant Emissions Units: Insignificant emission units are defined under APCD Rule 1301 as any regulated air pollutant emitted from the unit, excluding Hazardous Air Pollutants (HAPs), that are less than 2 tons per year based on the unit's potential to emit and any HAP regulated under section 112(g) of the Clean Air Act that does not exceed 0.5 ton per year based on the unit's potential to emit. Insignificant activities must be listed in the Part 70 application with supporting calculations. Applicable requirements may apply to insignificant units. (*See Attachment 10.6 for the Insignificant Emissions Unit list*)
- 1.6.3. Federal Potential to Emit: The federal potential to emit (PTE) of a stationary source does not include fugitive emissions of any pollutant, unless the source is: (1) subject to a federal NSPS/NESHAP requirement, or (2) included in the 29-category source list specified in 40 CFR 51.66 or 52.21. The federal PTE does include all emissions from any insignificant emissions units. Platform B is not subject to any NSPS or NESHAP; thus, its fugitive emissions are not listed in its federal PTE. (*See Section 5.4 for the federal PTE for this source*)
- 1.6.4. Permit Shield: The operator of a major source may be granted a shield: (a) specifically stipulating any federally enforceable conditions that are no longer applicable to the source and (b) stating the reasons for such non-applicability. The permit shield must be based on a request from the source and its detailed review by the APCD. Permit shields cannot be granted indiscriminately with respect to all federal requirements. DCOR has not made a request for a permit shield.
- 1.6.5. Alternate Operating Scenarios: A major source may be permitted to operate under different operating scenarios, if appropriate descriptions of such scenarios are included in its Part 70 permit application and if such operations are allowed under federally-enforceable rules. DCOR has made no request for permitted alternative operating scenarios.
- 1.6.6. Compliance Certification: Part 70 permit holders must certify compliance with all applicable federally enforceable requirements including permit conditions. Such certification must accompany each Part 70 permit application; and, be re-submitted annually on or before March 1<sup>st</sup> or on a more frequent schedule, as specified in the permit. Each certification is signed by a "responsible official" of the owner/operator company whose name and address is listed prominently in the Part 70 permit. (*See Section 1.6.10 below*)
- 1.6.7. Permit Reopening: Part 70 permits are re-opened and revised if the source becomes subject to a new rule or new permit conditions are necessary to ensure compliance with existing rules. The permits are also re-opened if they contain a material mistake or the emission limitations or other conditions are based on inaccurate permit application data. (*See Section 4.10.3, CAM Rule*)
- 1.6.8. MACT/Hazardous Air Pollutants (HAPs): Part 70 permits also regulate emission of HAPs from major sources through the imposition of maximum achievable control technology (MACT), where applicable. None of the emissions units at this facility are currently subject to any MACT (see section 3.2.5 for specifics on 40 CFR 63, Subpart HH). In addition, based on CAAA, Section 112(n)(4) stipulations, HAP emissions from any equipment at this facility cannot be aggregated with HAP emissions from other similar units at the facility. Thus, HAP emissions computations were not addressed in this permit.

1.6.9. Compliance Assurance Monitoring (CAM): The CAM rule became effective on April 22, 1998. This rule affects emission units at the source subject to a federally enforceable emission limit or standard that uses a control device to comply with the emission standard, and either pre-control or post-control emissions exceed the Part 70 source emission thresholds. Sources subject to CAM Rule must submit a CAM Rule Compliance Plan along with their Part 70 operating permit renewal applications. (*See Section 4.9.3*). The APCD has determined that no emissions unit at this facility is subject to CAM Rule.

1.6.10 Responsible Official: The designated responsible official and their mailing address are:

**Mr. Mike Finch, Director, ES & RC  
DCOR, LLC.  
290 Maple Court, Suite 290  
Ventura, California 93003**

## 2.0 Process Description

### 2.1 Process Summary

- 2.1 Process Summary: Platform B is an oil and gas production platform. Production equipment on the platform consists of oil and gas separators, a free water knockout unit, a glycol dehydration unit, gas compressors, dehydration units, water treating equipment, oil shipping pumps, a Wemco flotation cell unit and a flare relief system. The crude oil and natural gas produced are sweet and have minimal concentrations of H<sub>2</sub>S and mercaptans.

Crude oil and natural gas are shipped through two separate sub-sea pipelines to the Rincon Onshore Oil & Gas facility in Ventura County for final processing. The treated produced water is either pumped into injection wells or discharged into the ocean at a depth of 143 feet to meet the existing federal NPDES (National Pollutant Discharge Elimination System) permit conditions.

- 2.1.1 Production: Platform B has sixty-three well slots located in three well rooms. A total of 53 wells were drilled between 1969 and 1983 and there are currently 43 production wells. Ten wells are injection wells for disposing of produced water. The production wells are not free flowing; submersible pumps or rod pumps have been installed in all wells to assist in production. Platform B has a design production rate of 38,000 bpd of oil emulsion and 15 MMscfd of gas.

The oil production flow line from each wellhead ties into three separate piping manifolds or headers. These three manifolds are the gross oil header, the test oil header, and the well clean header. Normally, the flow from each well enters a gross oil header; two gross oil headers are provided for well room No. 1, which contains 45 of the 63 production well slots on the platform. The gross oil headers are piped to gross oil (and gas) separators No. 1 and No. 2 (MBD-101 and MBD-102). There are two separate test headers, one for well room No. 1 and one for well rooms No. 2 and No. 3.

From the gross oil and gas separators, the oil emulsion flows to the free water knockout (MAM-121). Oil separated in the free water knockout flows to the oil shipping surge tank (MBJ-131), commingles with wet crude oil from Platform Hillhouse, and is then pumped into the subsea pipeline to the Rincon facility by the shipping pumps. A turbine meter at the pipeline inlet measures the emulsion flow rate; and totals the amount of oil produced on Platform B. The produced water removed in the free water knockout is treated in the flotation cell (Wemco unit) to remove residual oil and is then pumped into injection wells or discharged in the ocean.

Two test separators (MBD-111 and MBD-112) are used to flow test the individual production wells. For the flow test, the well is switched from the production header to the test header. Only one well is tested at a time in each test separator. Oil from the test separators is commingled with oil from the gross oil separators in the free water knockout tank. The well clean header and well clean tank (MBF-201) are used to start-up a well after testing or work over activities are completed. For the first few hours when a well is brought back on line, gas surge and contamination from drilling fluids or reservoir sand can occur. After the flow rate stabilizes and any drilling fluids are removed, the well is switched to the production header and separator.



Natural gas from the well clean tank (MBF-201) is compressed by the 10 hp I-R vapor compressor. The vapor compressor discharge is commingled with gas from the gross oil separators and test separators. The combined gas stream is compressed by two Allis-Chalmers (AC) main gas compressors 4006-40610-1 and CBA-235 to a pressure of approximately 120 psig (pounds per square inch gauge) and then dehydrated in the glycol dehydration unit. Natural gas produced on Platform B is shipped in a (common) pipeline to the Rincon facility for processing. An orifice meter at the gas pipeline inlet records the gas flow rate from Platform B.

- 2.1.2 Gas, Oil, and Water Separation: Fluid from the production wells is a mixture of oil, gas, and water. Separation of the liquid and gas streams is accomplished in gross oil separators No. 1 and No. 2, which are horizontal, two-phase separators 6' in diameter by 16'8" seam-to-seam length. Fluids from wells are produced directly into the gross oil (and gas) separators and the normal production from all wells at Platform B is handled by these separators. Both separators are usually in simultaneous operation, thereby maximizing the liquid retention time and providing optimum liquid and gas separation.

The gross oil separators operate at 65 psig and 100°F. The gas section (top half) of the separator is designed to sufficiently reduce the velocity of the gas to cause any liquid to drop out. Both separators also have a mist extractor to promote removal of liquid droplets from the gas stream. Operating pressure of the separators is automatically controlled by a pressure control valve in the gas outlet line. Gas from the gross oil separators flows in a common header to the main gas scrubber. Oil removed in the main gas scrubber flows to the well clean tank. Gas from the main gas scrubber goes to the suction of the AC main gas compressors.

The liquid section (bottom half) of the gross oil separators is designed with sufficient retention time to allow any entrained gas to bubble off from the liquid. The liquid section is not large enough, however, to allow separation of the oil and water into two separate streams. Liquid level in the separators is controlled by a level control valve. The oil and water discharged from the gross oil separators flows to the free water knockout.

The free water knockout is larger than the other separators and is used to reduce the water cut (*i.e.*, water concentration) of the crude oil. Oil and water separation in the free water knockout takes place through gravity separation. The water cut of the crude oil leaving the free water knockout is controlled to a level as low as possible. Produced water from the free water knockout tank flows to the Wemco flotation cell unit for further processing, and the separated oil flows to the oil shipping surge tank. Water and oil flows are measured by separate turbine meters. Oil and water levels in the free water knockout are controlled independently; the water level controller controls the flow of water to the Wemco flotation cell unit and the oil level controller controls the flow of oil to the oil shipping surge tank.

2.1.3 Waste Water Treatment: The Wemco flotation cell unit (ABM-401) agitates the produced water to further separate the remaining oil. The agitation produces an oily froth. The froth is skimmed off inside the Wemco flotation unit and drains by gravity to the skimmer tank (ABJ-441). Treated produced water flows out the end of the Wemco flotation cell unit and is pumped by the charging pumps to the suction side of the water injection pumps which supply water to the injection wells. Some of the high pressure water is pumped through a 6" sub-sea pipeline to Platform C for water injection. Excess produced water from the Wemco flotation cell unit is disposed in the ocean by way of the cuttings chute; a turbine meter measures the amount of disposed water.

2.1.4 Well Testing and Maintenance: To measure the oil, gas, and water flow rates from a well, the fluid from the well is produced into either test separator No. 1 or No. 2 by closing the well flow line valve to the gross oil header and opening the well flow line valve to the test header. The test separator is a vertical, two phase separator 3'6" in diameter by 20'4" seam-to-seam length, with a capacity of 5,000 bpd liquid and 5 MMscfd of natural gas. Its capacity is smaller than the gross oil separators since only one well is tested at a time. The test separators have a mist extractor to promote removal of liquid droplets from the gas stream. Each separator has a pressure control valve to maintain the operating pressure at 65 psig. Gas separated in each test separator is measured by an orifice meter in the outlet line and is commingled with the gas from the gross oil separators.

The liquid from the test separators is measured by a turbine meter. This meter measures the total liquid flow of the combined oil and water stream. The water cut is determined by collection and analysis of samples. The oil and water from the test separators is combined with the oil and water from the gross oil separators, and then processed in the free water knockout.

2.1.5 Emulsion Breaking and Crude Oil Storage: There are no emulsion breaking or crude oil storage facilities on Platform B. The produced oil/water emulsion is shipped to the Rincon facility for final processing.

2.1.6 Emulsion Shipping: The oil shipping surge tank (MBJ-131) receives oil from the free water knockout and waste oil pumps; it is a vertical pressure vessel 10' in diameter by 19' seam-to-seam length operating at 15 psig. The tank provides surge capacity to stabilize the flow of oil and prevents upsets in the downstream processing equipment. Oil is pumped from the tank by one of three oil shipping pumps. The pump flow rate is controlled by a level controller that modulates a control valve in the pump discharge line, thereby maintaining the level in the oil shipping surge tank within an acceptable operating range. The oil shipping pumps discharge into the 12" sub-sea pipeline to the Rincon facility; oil flow rate to the pipeline is measured by a turbine meter.

2.1.7 Drain Sumps: The waste water tank (ABJ-431) is a cone-bottom tank, which is primarily used to remove solids from the oily water. The waste water tank receives water from the platform deck drains. Vacuum trucks are periodically transported to the platform on the supply boat to remove solids from the waste water tank. The liquid in the waste water tank overflows into the skimmer tank and is pumped from there to the oil shipping surge tank. The skimmer tank (ABJ-441) also receives oil skimming from the Wemco unit and oily water from the well room drains. Oil and water from the well clean tank are drained to the waste oil tank (ABJ-451) and is also pumped to the oil shipping surge tank. Natural gas from all three tanks is gathered by the flotation deck.

- 2.1.8 Gas Compression, Dehydration, and Disposition: Natural gas removed from the crude oil in the gross oil separators, test separators, free water knockout and oil shipping surge tank is compressed, dehydrated, and shipped to the Rincon facility in a twelve-inch sub-sea pipeline.

Natural gas removed in the gross oil separators, test separators and free water knockout flows to the main gas scrubber for liquid removal. The gas is then compressed by the Allis-Chalmers main gas compressors (CBA-235 and 4010-40106-1) to a pressure of 120 psig. A horizontal suction scrubber is provided in the suction header to the compressors to remove entrained liquids that could damage the compressor. The discharged gas from the AC compressors is cooled by a fin-fan cooler. Liquids condensed in these heat exchangers are removed in the glycol contactor.

The wet gas flows from the fin-fan cooler to the glycol dehydration unit, which is used to lower the water content of the gas down to the sales gas pipeline requirement. The glycol dehydration unit consists of a glycol contactor, filters, exchangers, a dehydrator, surge tank, and associated pumps. The contactor is a tray-ed pressure vessel 4'6" in diameter by 25' seam-to-seam length with a capacity of 10 MMscfd. Pressure in the contactor is maintained at 120 psig by a pressure control valve in the gas outlet line. Inside the contactor, the wet gas flows counter to the flow of tri-ethylene glycol (TEG), which absorbs water from the natural gas. The rich (wet) TEG from the contactor is regenerated in the dehydrator after passing through two filters to remove impurities picked up from the natural gas. The dehydrator operates at atmospheric pressure and 360°F; it uses 40 kW electric immersion heater to heat the TEG and boil off the entrained water and hydrocarbons. The vapor is vented to the flare relief system. The lean (regenerated) TEG from the dehydrator is cooled in the glycol exchangers, improving water absorption in the contactor and preheating the rich TEG going to the dehydrator. From the exchangers, the lean TEG flows into a 3' diameter by 10' long surge tank, which provides surge capacity to allow the lean TEG to be pumped back to the contactor.

Dehydrated gas leaving the glycol contactor flows directly to the twelve-inch sub-sea pipeline to the Rincon facility. An orifice meter is provided on the pipeline inlet to record the gas flow rate from Platform B.

- 2.1.9 Gas Sweetening and Sulfur Recovery: The gas produced from Platform B is sweet gas. There is no gas sweetening or sulfur recovery facility on Platform B.
- 2.1.10 Vapor Recovery Systems: Low-pressure gas from the wastewater, skimmer, and waste oil tanks is compressed by the flotation deck vapor recovery compressor, which discharges to the well clean tank. The well clean tank, which also receives gas from the oil shipping surge tank, is used as the suction scrubber for removing entrained liquids from the gas streams for the main vapor compressor. The vapor compressor compresses the gas to about 30 psig and discharges to the main gas scrubber where the gas is commingled with the gas from the gross oil separators, test separators and free water knockout.

Pressure relief valves on pressure vessels, compressors, and other equipment handling hydrocarbon liquids or vapors discharge to a ten-inch relief header. The pressure relief valves only open during emergency situations or during required safety testing. The relief header flows into a flare gas scrubber that removes any liquid discharged from the pressure relief valves. A back pressure control valve on the gas gathering header can also release natural gas to the flare gas scrubber; this control valve will only release gas if the AC main gas compressors have a mechanical failure or the gas pipeline to shore is shut-in. Gas from the flare gas scrubber goes to the platform flare stack, while the liquid flows to the waste water tank.

- 2.1.11 Fuel Gas System: Platform B does not have an operational fuel gas system; the former fuel gas system is out of service. There is no gas-fired equipment such as turbines or heaters on the platform.

Platform B is equipped with a 3,200 gallon diesel storage tank in one of the crane pedestals. Diesel fuel is used by the two pedestal cranes and emergency equipment; CARB diesel fuel is used and contains less than 0.0015 percent sulfur by weight.

- 2.1.12 Flare Relief System: Platform B is equipped with a flare system to minimize emissions of ROCs that would otherwise be emitted to the atmosphere.

- 2.1.12.1 Flare System Design: The flare system receives gas from relief valves and piping vents which are first routed to the flare header. The equipment connected to the flare header is as follows:

- Gross oil separators (MBD-101 and 102)
- Test separators (MBD-111 and 112)
- Free water knockout (MAM-121)
- Oil shipping surge tank (MBJ-131)
- Well clean tank (MBF-201)
- Main gas scrubber (MBF-211)
- Inlet suction scrubber (MBF-221)
- Glycol contactor (MAF-301)
- Allis-Chalmers main gas compressors (4006-40610-1 and CBA 235)
- Flotation deck vapor recovery compressor (CBA-291)
- Main (Fuller) vapor compressor (CBA-202)
- Gas compressor suction pressure control valve (PCV-211)

All gas collected in the flare header is routed to the flare boom and on to the flare tip where it is burned. A Daniels ten-inch orifice meter is used to measure and record the gas that is flared. Its range of operation is 0.012 MMscfd minimum to 10 MMscfd maximum.

2.1.12.2 Planned Flaring Events: Flaring emissions to the atmosphere are due to both planned and unplanned events. Planned events include (but are not limited to):

- pipeline pigging operations
- compressor shutdowns/startups for routine maintenance
- well casing blow downs during workover and rig operations
- new well unloading and cleanup
- clearing of gas lines during equipment or process turnarounds
- episodic events such as equipment depressurization for maintenance, purging of vessels and gas pipeline blow downs
- MMS ordered safety tests

2.1.12.3 Unplanned Flaring Events: Unplanned flaring events are defined as all flaring that does not meet the definition of planned flaring under Rule 359. Unplanned or emergency events include, but are not limited to, the following:

- emergency shutdowns caused by safety devices
- well surges during drilling or production
- unintentional pressure safety valve releases
- processing equipment or compressor failures
- onshore facility failures that affect platform operations
- faulty-sensor caused shutdowns
- high/low temperature and pressure indicated shutdowns
- electrical equipment failures and power failure
- pipeline failures
- earthquakes or other unforeseeable emergency events

## **2.2 Support Systems**

2.2.1 Piping Assemblies and Pipelines: The piping on Platform B is designed, tested, and installed in general accordance with API 14C and 14E. In general, piping 2" or larger is of welded carbon steel construction; whereas, piping 1.5 inches and smaller is generally of threaded carbon steel construction. Three pipelines are associated with the platform: a 12-inch oil and an 8-inch gas line to the Rincon facility, and a 6-inch wastewater line to Platform C.

2.2.2 Power Generation: Electrical power for Platform B is provided from shore by Southern California Edison through a 34.5 kV subsea cable. The platform has a 21.8 hp 'Onan P2297' diesel stand-by generator which is used in the event of a power outage from Southern California Edison. During such a power failure, the Motor Control Center (MCC) on Platform B supplies standby power from the diesel generator to critical equipment, such as the fire pumps. A 24-volt battery backup system is provided for the essential platform controls.

2.2.3 Crew Boats: One crew boat is used for crew and light supply transport in support of Platform B. The crew boat is shared with Platforms A, C, Habitat, Henry, and Hillhouse.

2.2.4 Supply Boats: Two supply boats are used for supply and equipment transport in support of Platform B. The supply boats, based in Port Hueneme, also services Platform's Henry, Hillhouse, A, C, Habitat, Gina, Gilda, and Irene.

- 2.2.5 Helicopter: There is a helipad on Platform B, but helicopters are not used for routine offshore transportation. *Information on the estimated emissions (less than 2 tpy) from this activity has been provided to the APCD. However, this emissions unit is not included in the permit.*
- 2.2.6 Emergency Response Drills: DCOR conducts periodic and unannounced emergency response drills. Several plans have been developed for different types of emergency situations that could occur on or around the platform. The plans include the Emergency Evacuation Plan and Oil Spill Contingency Plan. All of the plans have been prepared to comply with applicable rules and regulations and guidelines set forth by the appropriate regulatory agencies. In addition, the following drills are practiced by the entire crew on a regular basis: (1) man overboard, (2) combustible gas, (3) abandon platform, and (4) emergency shutdown.

### **2.3 Drilling Activities**

- 2.3.1 Drilling Program: Platform B has a resident electric drilling rig, which is used for drilling oil-gas production wells.
- 2.3.2 Well Work over Program: The resident electric drilling rig is used for servicing wells. Well work-over programs have been conducted in the past on Platform B and may likely occur in the future.

### **2.4 Maintenance/Degreasing Activities**

- 2.4.1 Paints and Coatings: Maintenance painting on Platform B is conducted on an intermittent basis. Normally only touchup and equipment labeling or tagging is done with cans of spray paint.
- 2.4.2 Solvent Usage: Solvents not used for surface coating thinning may be used on the platform for daily operations. Usages include cold solvent degreasing and wipe cleaning with rags.

### **2.5 Planned Process Turnarounds**

Process turnarounds on platform equipment are scheduled to occur when the onshore receiving facilities are required to shut down for maintenance. There are approximately one or two turnarounds per year, each of which lasts from two to three days. Major pieces of equipment such as gas compressors undergo maintenance as specified by the manufacturer. Maintenance of critical components is carried out according to the requirements of Rule 331 {Fugitive Emissions Inspection and Maintenance}. The emissions from planned process turnarounds are incorporated in the emissions category for planned flaring.

### **2.6 Other Processes**

- 2.6.1 Pigging: Two (2) pig launchers and two (2) pig receivers are installed at Platform B. Pigging operations (launching and receiving) occur between the platform and the Rincon facility. Oil lines are pigged once a week, gas lines four times a week. All pig launchers and receivers are connected both to the blanket gas system and to the platform's vapor recovery system. This ensures an ROC removal efficiency of 90 percent and a low ROC/TOC ratio (= 0.1527).
- 2.6.2 Other processes: DCOR has stated that no other processes exist that would be subject to permit.

## **2.7 Detailed Process Equipment Listing**

Refer to the tables in Attachment 10.4 for a complete listing of all permitted emission units.

Permit-exempt emission units are specifically listed in Attachments 10.5 and 10.6.

### 3.0 Regulatory Review

This Section identifies the federal, state and local rules and regulations applicable to Platform B.

#### 3.1 Rule Exemptions Claimed

- ☐ APCD Rule 202 (*Exemptions to Rule 201*): DCOR has requested a number of exemptions under this rule. An exemption from permit, however, does not necessarily grant relief from any applicable prohibitory rule. Specific exemptions are noted below:
  - Section 202.F.1.e for one 'Onan' P2297' electrical generator driven by a diesel-fired piston internal combustion engine rated at 21.8 bhp.  
*Note: This IC engine does not qualify as an 'insignificant' unit, based on its annual 'potential to emit' NOx; thus, it must be included in the federal Part 70 permit.*
  - Section 202.F.1.e for a 49 bhp, "John Deere, Model 70-DPO-JD" diesel-fired piston IC engine driving a 'Sullair' (100 – 125 psig, 100 – 170 cfm) portable air compressor; *the compressor is used at all DCOR South County OCS platforms, and is included in PTO 9110.*  
*Note: This IC engine does not qualify as an 'insignificant' unit, based on its annual 'potential to emit' NOx; thus, it must be included in the federal Part 70 permit.*
  - Section 202.V.2 for one diesel fuel #2 storage tank with a 3,200 gallon capacity.
  - Section D.6 (*De Minimis Exemption*). DCOR has documented 9 de minimis projects that resulted in an increase of 5.75 lbs/day of ROC emissions for Platform B (re: DCOR's September 2, 2008 CVR submittal (De Minimis Tables) to the APCD). Each of the increases was below the 2.4 lb/day exemption threshold and the aggregate for the stationary source is below the 24 lb/day exemption threshold.
  - Section D.8 for routine repair or maintenance of permitted equipment.
  - Section D.14 for application of architectural coating in the repair and maintenance of a stationary structure.
  - Section U.3 for wipe cleaning using solvents as long as the solvents meet other applicable requirements and the use does not exceed 55 gallons/year.
- ☐ APCD Rule 331 (*Fugitive Emissions Inspection and Maintenance*): The following exemptions were applied for and approved by the APCD:
  - Section B.2.b for components buried below the ground.
  - Section B.3.b for components handling liquids or gases with ROC concentrations less than 10 percent by weight.
- ☐ APCD Rule 333 (*Control of Emissions from Reciprocating Internal Combustion Engines*): Under Section B.1.b, engines exempt per Rule 202 are also exempt from the requirements of this rule. Therefore, both the generator engine and the air compressor engine listed above under the Rule 202 exemption are not required to comply with Rule 333. Furthermore, the south pedestal crane (15-ton), driven by a diesel-fired piston internal combustion engine rated at 109 bhp, is exempt per Section 333.B.2 (less than 200 hours per year of operation) from Sections E (emission limits), F (engine inspections), G (compliance plan) and I (testing).



### **3.2 Compliance with Applicable Federal Rules and Regulations**

- 3.2.1 40 CFR Parts 51/52 {New Source Review (Nonattainment Area Review and Prevention of Significant Deterioration)}: Platform B was constructed and permitted prior to the applicability of these regulations. However, all permit modifications after September 4, 1992 are subject to APCD NSR requirements. *[Note: Some equipment installed after September 4, 1992 were identified earlier in the OCS Compliance Plans, and thus were not subject to NSR requirements]* Compliance with APCD Regulation VIII (New Source Review) ensures that future modifications to the facility will comply with these regulations.
- 3.2.2 40 CFR Part 55 {OCS Air Regulation}: DCOR is operating Platform B in compliance with the requirements of this regulation.
- 3.2.3 40 CFR Part 60 {New Source Performance Standards}: None of the equipment items in this permit are subject to NSPS requirements.
- 3.2.4 40 CFR Part 61 {NESHAP}: None of the equipment items in this permit are subject to any NESHAP requirement.
- 3.2.5 40 CFR 63 {MACT}: This facility submitted to the USEPA its 'Notice of Applicability' of 40 CFR 63: Subpart HH, (Oil & Gas Production MACT), on October 18, 2000. None of the emissions units at this facility are currently subject to any MACT, specifically to 40 CFR 63, Subpart HH. (Reference: APCD letter to Nuevo on 11/15/2001 and Nuevo response on 12/10/2001 for Platforms A, B, C, Henry, and Hillhouse) A 'black oil' exemption was claimed and validated. However, DCOR must maintain adequate recordkeeping, as specified in 40 CFR63, Subpart A to affirm its exemption from this MACT under the 'black oil' provisions of the MACT.
- 3.2.6 40 CFR Part 64 {Compliance Assurance Monitoring}: This rule became effective on April 22, 1998. None of the emission units at this facility are subject to the requirements of the CAM Rule, per 40 CFR 64.2 (Applicability). Pre-control emissions of any pollutant from the North crane unit are less than 100 tpy; while the South crane and the boat engines do not use any control device to comply with any federally enforceable emissions limit.
- 3.2.7 40 CFR Part 70 {Operating Permits}: This Subpart is applicable to Platform B. Table 3.1 lists the federally enforceable APCD promulgated rules that are "generic" and apply to DCOR OCS. Table 3.2 lists the federally enforceable APCD promulgated rules that are "unit-specific" that apply to DCOR OCS. These tables are based on data available from the APCD's administrative files and DCOR's Part 70 Operating Permit *Renewal* Application No. 9111 filed submitted on October 13, 2006. Table 3.4 includes the APCD's adoption dates of these rules.

In its Part 70 *renewal* application, DCOR certified compliance with all existing APCD rules and permit conditions. This certification is also required of DCOR semi-annually. Issuance of this permit and compliance with all its terms and conditions will ensure that DCOR complies with the provisions of all applicable Subparts.

- 3.2.8 Airborne Toxic Control Measure (ATCM) for Stationary Compression Ignition (CI) Engines (CCR Section 93115, Title 17): This applies for all diesel engines rated over 50 brake horsepower located at this OCS facility. See discussion in section 3.3.3 below.

### **3.3 Compliance with Applicable State Rules and Regulations**

- 3.3.1 Division 26, Air Resources {California Health & Safety Code}: The administrative provisions of the Health & Safety Code apply to this facility and will be enforced by the APCD. These provisions are APCD-enforceable only.
- 3.3.2 California Administrative Code Title 17: These sections specify the standards by which abrasive blasting activities are governed throughout the State. All abrasive blasting activities at Platform B are required to conform to these standards. Compliance will be assessed through onsite inspections. These standards are APCD-enforceable only. However, CAC Title 17 does not preempt enforcement of any SIP-approved rule that may be applicable to abrasive blasting activities.
- 3.3.3 Airborne Toxic Control Measure (ATCM) for Stationary Compression Ignition (CI) Engines (CCR Section 93115, Title 17): This ATCM applies for all stationary diesel-fueled engines rated over 50 brake horsepower (bhp) at this facility. On March 17, 2005, APCD Rule 202 was revised to remove the compression-ignited engine (e.g. diesel) permit exemption for units rated over 50 bhp to allow the APCD to implement the State's ATCM for Stationary Compression Ignition Engines. Compliance shall be assessed through onsite inspections and reporting. The operating requirements and emission standards outlined in the ATCM do not apply to stationary diesel-fueled engines solely used on the OCS. However these OCS engines are required to meet fuel, recordkeeping, reporting, and monitoring requirements outlined in the ATCM. On January 30, 2006 the DICE ATCM was incorporated into 40 CFR Part 55, making the requirements of the DICE ATCM federally enforceable in the OCS.

### **3.4 Compliance with Applicable Local Rules and Regulations**

- 3.4.1 Applicability Tables: In addition to Tables 3.1 and 3.2, Table 3.3 lists the non-federally enforceable APCD promulgated rules that apply to Platform B. Table 3.4 lists the adoption date of all rules applicable to this permit at the date of this permit's issuance.
- 3.4.2 Rules Requiring Further Discussion: The last facility inspections occurred on October 14, 2008. The inspector reported that the facility was in compliance with all APCD rules and PTO conditions. This section provides a more detailed discussion regarding the applicability and compliance of certain rules.

The following is a rule-by-rule evaluation of compliance for Platform B:

*Rule 301 - Circumvention*: This rule prohibits the concealment of any activity that would otherwise constitute a violation of Division 26 (Air Resources) of the California H&SC and the SBCAPCD rules and regulations. To the best of the APCD's knowledge, DCOR is operating in compliance with this rule.

*Rule 302 - Visible Emissions:* This rule prohibits the discharge from any single source any air contaminants for which a period or periods aggregating more than three minutes in any one hour which is as dark or darker in shade than a reading of 1 on the Ringelmann Chart or of such opacity to obscure an observer's view to a degree equal to or greater than a reading of 1 on the Ringelmann Chart. Sources subject to this rule include: the flare and all diesel-fired piston internal combustion engines. Compliance will be assured by requiring all engines to be maintained according to manufacturer maintenance schedules, and through visible emissions monitoring requirements in Condition 9.B.2. Rule 359 addresses the need for the flares to operate in a smokeless fashion.

*Rule 305 - Particulate Matter, Southern Zone:* DCOR OCS Platform B is considered a Southern Zone source. This rule prohibits the discharge into the atmosphere from any source particulate matter in excess of specified concentrations measured in gr/scf. The maximum allowable concentrations are determined as a function of volumetric discharge, measured in scfm, and are listed in Table 305(a) of the rule. Sources subject to this rule include: the flares and all IC engines including all diesel-fired units. Improperly maintained diesel engines have the potential to violate this rule. Compliance will be assured by requiring all engines to be maintained according to an *IC engine Particulate Matter Operation and Maintenance Plan* (similar to the one submitted by Nuevo to the APCD for Platform Habitat in May 2002 addressing the emergency IC engines in this PTO) to be submitted by DCOR within 90 days of issuance of the final Part 70/APCD PTO 9111-R3. The Plan will require APCD approval and immediate full implementation upon such approval.

*Rule 309 - Specific Contaminants:* Under Section "A", no source may discharge sulfur compounds and combustion contaminants in excess of 0.2 percent as SO<sub>2</sub> (by volume) and 0.3 gr/scf (at 12% CO<sub>2</sub>) respectively. Sulfur emissions due to flaring of sweet gases (less than 4 ppm sulfur) at Platform B will comply with the SO<sub>2</sub> limit due to stoichiometric combustion requirements. All diesel powered piston IC engines have the potential to exceed the combustion contaminant limit if not properly maintained (see discussion on Rule 305 above for compliance).

*Rule 310 - Odorous Organic Compounds:* This rule prohibits the discharge of H<sub>2</sub>S and organic sulfides that result in a ground level impact beyond the property boundary in excess of 0.06 ppmv averaged over 3 minutes or 0.03 ppmv averaged over 1 hour. No measured data exists to confirm compliance with this rule; however, all produced gas from Platform B is sweet (*less than 4 ppmv S*). As a result, it is expected that compliance with this rule will be achieved.

*Rule 311 - Sulfur Content of Fuels:* This rule limits the sulfur content of fuels combusted on Platform B to 0.5 percent (by weight) for liquids fuels and 15 gr/100 scf (calculated as H<sub>2</sub>S) {or 239 ppmvd} for gaseous fuels. All piston IC engines on the platform and on the crew and supply boats are expected to be in compliance with the liquid fuel limit as determined by fuel analysis documentation. The flare relief system is not subject to this rule (see discussion under Rule 359).

*Rule 317 - Organic Solvents:* This rule sets specific prohibitions against the discharge of emissions of both photochemically and non-photochemically reactive organic solvents (40 lb/day and 3,000 lb/day respectively for each equipment item). Solvents may be used on the platform during normal operations for degreasing by wipe cleaning and for use in paints and coatings in maintenance operations. There may be a potential to exceed the limits under Section B.2 during significant surface coating activities. DCOR will be required to maintain records to ensure compliance with this rule.

*Rule 322 - Metal Surface Coating Thinner and Reducer:* This rule prohibits the use of photochemically reactive solvents for use as thinners or reducers in metal surface coatings. DCOR will be required to maintain records during maintenance operations to ensure compliance with this rule.

*Rule 323 - Architectural Coatings:* This rule sets standards for the application of surface coatings. The primary coating standard that will apply to the platform is for Industrial Maintenance Coatings which has a limit of 340 gram ROC per liter of coating, as applied. DCOR will be required to comply with the Administrative requirements under Section F for each container on the platform.

*Rule 324 - Disposal and Evaporation of Solvents:* This rule prohibits any source from disposing more than one and a half gallons of any photochemically reactive solvent per day by means that will allow the evaporation of the solvent into the atmosphere. DCOR will be required to maintain records to ensure compliance with this rule.

*Rule 325 - Crude Oil Production and Separation:* This rule applies to equipment used in the production, gathering, storage, processing and separation of crude oil and gas prior to custody transfer. The primary requirements of this rule are under Sections D and E. Section D requires the use of vapor recovery systems on all tanks and vessels, including waste water tanks, oil/water separators, waste oil tanks, skimmer tanks and flotation cells (Wemco Unit). Section E requires that all produced gas be controlled at all times, except for wells undergoing routine maintenance. All production and test vessels and tanks are connected to gas gathering systems and all relief valves are connected to the flare relief system. Also, vapor recovery units have been installed on all equipment subject to this rule. Compliance with Section E is met by directing all produced gas to a sales compressor, injection well or to the flare relief system.

*Rule 330 - Surface Coating of Metal Parts and Products:* This rule sets standards for many types of coatings applied to metal parts and products. In addition to the ROC standards, this rule sets operating standards for application of the coatings, labeling and recordkeeping.

*Rule 331 - Fugitive Emissions Inspection and Maintenance:* This rule applies to components in liquid and gaseous hydrocarbon service at oil and gas production fields. An updated I&M Plan was submitted in July 2001, followed by a revised one in June 2002. The final Plan received APCD approval in September 2002. Ongoing compliance with the many provisions of this rule will be assessed via platform inspection by APCD personnel using an organic vapor analyzer and through analysis of operator records. Platform B does not perform any routine venting of hydrocarbons to the atmosphere. All gases routinely vented are directed to the flare relief system or vapor recovery system. *Note: Nuevo informed the APCD in June 2002 that the 614 stainless steel fittings on Platform B, 1/2-inch or less in diameter, are no longer exempt from Rule 331; since they could not demonstrate the leak-free nature of these fittings. These fittings are included in the I&M Plan inventory for Platform B.*

*Rule 333 - Control of Emissions from Reciprocating Internal Combustion Engines:* This rule applies to all engines with a rated brake horsepower of 50 or greater that are fueled by liquid or gaseous fuels. The South pedestal crane engine is exempt from Rule 333 emission standards. The North diesel-fired pedestal crane engine on Platform B is subject to the NO<sub>x</sub> emission standard in Rule 333.

On June 19, 2008 Rule 333 was revised. The NO<sub>x</sub> emission limit for diesel-fired engines was reduced, and ROC and CO limits were added. In addition, the inspection and maintenance requirements of the Rule were changed. The preexisting emission limits of Rule 333 (797 ppmvd NO<sub>x</sub> at 15% O<sub>2</sub>) apply until two years after the revised Rule 333 was added to 40 CFR OCS Part 55. The revised Rule became effective on the OCS on November 21, 2008. Thus, the revised limits will apply starting November 21, 2010. In addition, operators of IC engines are required to submit new or revised Compliance Plans and Inspection and Maintenance plans within six months after the Rule revision became effective on the OCS. These plans are due by May 21, 2009.

DCOR has performed APCD-approved emission source testing on the crane engines. Ongoing compliance with the standards will be maintained through implementation of the APCD-approved Rule 333 IC Engine Maintenance Plan required under Section F and through biennial source testing.

*Rule 359 - Flares and Thermal Oxidizers:* This rule applies to flares for both planned and unplanned flaring events. A brief review of compliance with this Rule's Section D follows:

- D.1 - Sulfur Content in Gaseous Fuels: Compliance with this rule is anticipated since the analysis of produced gas from Platform B shows it to contain < 4 ppmvd of H<sub>2</sub>S.
- D.2 - Technology Based Standard: The flare on Platform B is in compliance with this section.
- D.3 - Flare Minimization Plan: DCOR has fully implemented their Flare Minimization Plan.

*Rule 360 – Emissions of Nitrogen From Large Water Heaters and Small Boilers:* The permittee shall comply with the requirements of this rule whenever a new boiler, process heater or other external combustion device is added or an existing unit is replaced. An ATC/PTO permit shall be obtained prior to installation of any grouping of Rule 360 applicable boilers or hot water heaters whose combined system design heat input rating exceeds 2.000 MMBtu/hr. An ATC shall be obtained for any size boiler or water heater if the unit is not fired on natural gas or propane. DCOR currently has no units subject to this rule.

*Rule 361 – Small Boilers, Steam Generators and Process Heaters:* The permittee shall comply with the requirements of this rule whenever a new boiler, process heater or other external combustion device is added or an existing unit is replaced. An ATC permit shall be obtained prior to installation, replacement, or modification of any existing Rule 361 applicable boiler or water heater rated over 2.000 MMBtu/hr. An ATC shall be obtained for any size boiler or water heater if the unit is not fired on natural gas or propane. DCOR currently has no units subject to this rule.

*Rule 505 - Breakdown Conditions:* This rule describes the procedures that DCOR must follow when a breakdown condition occurs to any emissions unit associated with Platform B. A breakdown condition is defined as an unforeseeable failure or malfunction of (1) any air pollution control equipment or related operating equipment which causes a violation of an emission limitation or restriction prescribed in the APCD Rules and Regulations, or by State law, or (2) any in-stack continuous monitoring equipment, provided such failure or malfunction:

- a. Is not the result of neglect or disregard of any air pollution control law or rule or regulation;
- b. Is not the result of an intentional or negligent act or omission on the part of the owner or operator;
- c. Is not the result of improper maintenance;
- d. Does not constitute a nuisance as defined in Section 41700 of the Health and Safety Code;
- e. Is not a recurrent breakdown of the same equipment item.

*Rule 603 - Emergency Episode Plans:* Section "A" of this rule requires the submittal of *Stationary Source Curtailment Plan* for all stationary sources that can be expected to emit more than 100 tons per year of hydrocarbons, nitrogen oxides, carbon monoxide or particulate matter. Such a plan was submitted on July 23, 1994. This Plan was approved in November 1994. (Note: This plan was updated on November 30, 1998).

### **3.5 Compliance History**

This section contains a summary of the compliance history for this facility since 1998 and was obtained from documentation contained in the APCD's Administrative file.

#### **3.5.1 Variances:** No variances are currently in effect for OCS Platform B.

3.5.2 Violations: Two Notices of Violation (NOV's) were issued since the last permit renewal was issued on April 13,2004:

*NOV No. 7996*: Violation of Rule 206. Issued 8/5/04. Specifically, exceeding the flaring volumes resulting in excess mass emissions. Resolved Date: 12/9/04.

*NOV No. 8289*: Violation of Rule 206. Issued 12/9/2004. Specifically, failure to measure H2S concentration of gas flaring events lasting more than one hour on several days in 2004. Resolved Date: 7/14/2005.

3.5.3 Significant Historical Hearing Board Actions/NOV's: There are no significant historical Hearing Board actions or NOV's.

Table 3.1 - Generic Federally-Enforceable APCD Rules

<b>Generic Requirements</b>	<b>Affected Emission Units</b>	<b>Basis for Applicability</b>
<u>RULE 101</u> : Compliance by Existing Installations	All emission units	Emission of pollutants
<u>RULE 102</u> : Definitions	All emission units	Emission of Pollutants
<u>RULE 103</u> : Severability	All emission units	Emission of pollutants
<u>RULE 201</u> : Permits Required	All emission units	Emission of pollutants
<u>RULE 202</u> : Exemptions to Rule 201	Applicable emission units, as listed in form 1302-H of the Part 70 application	Insignificant activities/emissions, per size/rating/function
<u>RULE 203</u> : Transfer	All emission units	Change of ownership
<u>RULE 204</u> : Applications	All emission units	Addition of new equipment or modification to existing equipment.
<u>RULE 205</u> : Standards for Granting Permits	All emission units	Emission of pollutants
<u>RULE 206</u> : Conditional Approval of ATCs or PTOs	All emission units	Applicability of relevant Rules
<u>RULE 207</u> : Denial of Applications	All emission units	Applicability of relevant Rules
<u>RULE 208</u> : Action on Applications – Time Limits	All emission units. Not applicable to Part 70 permit applications.	Addition of new equipment or modification to existing equipment.
<u>RULE 212</u> : Emission Statements	All emission units	Administrative
<u>RULE 301</u> : Circumvention	All emission units	Any pollutant emission
<u>RULE 302</u> : Visible Emissions	All emission units	Particulate matter emissions
<u>RULE 305</u> : PM Concentration -- South Zone	Each PM source	Emission of PM in effluent gas
<u>RULE 309</u> : Specific Contaminants	All emission units	Combustion contaminants
<u>RULE 311</u> : Sulfur Content of Fuel	All combustion units	Use of fuel containing sulfur
<u>RULE 317</u> : Organic Solvents	Emission units using solvents	Solvent used in process operations.
<u>RULE 322</u> : Metal Surface Coating Thinner and Reducer	Emission units using solvents	Solvent used in process operations.
<u>RULE 323</u> : Architectural Coatings	Paints used in maintenance and surface coating activities	Application of architectural coatings.



<b>Generic Requirements</b>	<b>Affected Emission Units</b>	<b>Basis for Applicability</b>
<u>RULE 324</u> : Disposal and Evaporation of Solvents	Emission units using solvents	Solvent used in process operations.
<u>RULE 505.A, B1, D</u> : Breakdown Conditions	All emission units	Breakdowns where permit limits are exceeded or rule requirements are not complied with.
<u>RULE 603</u> : Emergency Episode Plans	Stationary sources with PTE greater than 100 tpy	<i>Dos Cuadras – South County</i> is a major source.
<u>REGULATION VIII</u> : New Source Review	All emission units	Addition of new equipment or modification to existing equipment. Applications to generate ERC Certificates.
<u>REGULATION XIII (RULES 1301-1305)</u> : Part 70 Operating Permits	All emission units	<i>Dos Cuadras – South County</i> is a major source.

Table 3.2 - Unit-Specific Federally-Enforceable APCD Rules

<b>Unit-Specific Requirements</b>	<b>Affected Emission Units</b>	<b>Basis for Applicability</b>
<u>RULE 325</u> : Crude Oil Production and Separation	ID #'s 005513, 005514, 005515, 005516, 005517, 005518, 102148, 102149, 102147, 102150	All pre-custody production and processing emission units
<u>RULE 331</u> : Fugitive Emissions Inspection & Maintenance	All components (valves, flanges, seals, compressors and pumps) used to handle oil and gas : ID #'s 102165, 102166, 102167, 102168, 110954, 110956	Components emit fugitive ROCs.
<u>RULE 333</u> : Control of Emissions from Reciprocating IC Engines	Piston IC engines only; ID #s 004887, 004886	IC engines exceeding 50 bhp rating.
<u>RULE 359</u> : Flares and Thermal Oxidizers	Flare Relief System; ID # 005506	Flaring.
<u>RULE 360</u> : Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers	None	NOx emissions from external combustion units.

Table 3.3 - Non-Federally-Enforceable APCD Rules

<b>Requirement</b>	<b>Affected Emission Units</b>	<b>Basis for Applicability</b>
<u>RULE 210</u> : Fees	All emission units	Administrative
<u>RULE 310</u> : Odorous Org. Sulfides	All emission units	Emission of organic sulfides
<u>RULE 361</u> : Small Boilers, Steam Generators, and Process Heaters	None	Emission from external combustion units.
<u>RULES 501-504</u> : Variance Rules	All emission units	Administrative
<u>RULE 505.B2, B3, C, E, F, G</u> : Breakdown Conditions	All emission units	Breakdowns where permit limits are exceeded or rules are not complied with.
<u>RULES 506-519</u> : Variance Rules	All emission units	Administrative

Table 3.4 - Adoption Dates of APCD Rules Applicable at Issuance of Permit

<b><u>Rule No.</u></b>	<b><u>Rule Name</u></b>	<b><u>Adoption Date</u></b>
<u>Rule 101</u>	Compliance by Existing Installations: Conflicts	June 1981
<u>Rule 102</u>	Definitions	April 17, 1997
<u>Rule 103</u>	Severability	October 23, 1978
<u>Rule 201</u>	Permits Required	April 17, 1997
<u>Rule 202</u>	Exemptions to Rule 201	April 17, 1997
<u>Rule 203</u>	Transfer	April 17, 1997
<u>Rule 204</u>	Applications	April 17, 1997
<u>Rule 205</u>	Standards for Granting Permits	April 17, 1997
<u>Rule 206</u>	Conditional Approval of Authority to Construct or Permit to Operate	October 15, 1991
<u>Rule 207</u>	Denial of Applications	October 23, 1978
<u>Rule 208</u>	Action on Applications - Time Limits	April 17, 1997
<u>Rule 212</u>	Emission Statements	October 20, 1992
<u>Rule 301</u>	Circumvention	October 23, 1978
<u>Rule 302</u>	Visible Emissions	June 1981
<u>Rule 305</u>	Particulate Matter Concentration - Southern Zone	October 23, 1978
<u>Rule 309</u>	Specific Contaminants	October 23, 1978
<u>Rule 310</u>	Odorous Organic Sulfides	October 23, 1978
<u>Rule 311</u>	Sulfur Content of Fuels	October 23, 1978
<u>Rule 317</u>	Organic Solvents	October 23, 1978
<u>Rule 322</u>	Metal Surface Coating Thinner and Reducer	October 23, 1978
<u>Rule 323</u>	Architectural Coatings	July 18, 1996
<u>Rule 324</u>	Disposal and Evaporation of Solvents	October 23, 1978
<u>Rule 325</u>	Crude Oil Production and Separation	January 25, 1994
<u>Rule 331</u>	Fugitive Emissions Inspection and Maintenance	December 10, 1991
<u>Rule 333</u>	Control of Emissions from Reciprocating Internal Combustion Engines	June 19, 2008

<b><u>Rule No.</u></b>	<b><u>Rule Name</u></b>	<b><u>Adoption Date</u></b>
<u>Rule 359</u>	Flares and Thermal Oxidizers	June 28, 1994
<u>Rule 360</u>	Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers	October 17, 2002
<u>Rule 360</u>	Small Boilers, Steam Generators, and Process Heaters	January 17, 2008
<u>Rule 505</u>	Breakdown Conditions (Section A, B1 and D)	October 23, 1978
<u>Rule 603</u>	Emergency Episode Plans	June 15, 1981
<u>Reg. VIII</u>	New Source Review	April 17, 1997
<u>Rule 901</u>	New Source Performance Standards (NSPS)	May 16, 1996
<u>Rule 903</u>	Outer Continental Shelf (OCS) Regulations	November 10, 1992
<u>Rule 1001</u>	National Emission Standards for Hazardous Air Pollutants (NESHAPS)	October 23, 1993
<u>Rule 1301</u>	General Information	September 18, 1997
<u>Rule 1302</u>	Permit Application	November 9, 1993
<u>Rule 1303</u>	Permits	November 9, 1993
<u>Rule 1304</u>	Issuance, Renewal, Modification and Reopening	November 9, 1993
<u>Rule 1305</u>	Enforcement	November 9, 1993

## 4.0 Engineering Analysis

### 4.1 General

The engineering analyses performed for this permit were limited to the review of:

- ☞ facility process flow diagrams
- ☞ emission factors and calculation methods for each emissions unit
- ☞ emission control equipment (including RACT, BACT, NSPS, NESHAP, MACT)
- ☞ emission source testing, sampling, CEMS, CAM
- ☞ process monitors needed to ensure compliance

Unless noted otherwise, default ROC/THC reactivity profiles from the APCD's document titled "*VOC/ROC Emission Factors and Reactivities for Common Source Types*" dated 3/12/2001 (version 1.2) was used to determine non-methane, non-ethane fraction of THC.

### 4.2 Stationary Combustion Sources

The stationary combustion sources associated with Platform B consist of diesel-fired piston internal combustion engines and the flare relief system. Primary power on the platform is supplied by a sub-sea electric cable connected to the Southern California Edison electric grid.

*Piston Internal Combustion Engines:* All platform internal combustion engines are diesel-fuel fired. The 25-ton "North" crane engine is subject to permit and Rule 333 requirements. The other stationary IC engines on the platform rated over 50-bhp is the 15-ton "South" pedestal crane. Temporary engines used to support drilling and well work-over activities are expected to occur during the life of the platform. The calculation methodology is similar for all ICEs.

$$ER = [ (EF \times BHP \times BSFC \times LCF \times HPP) \div 10^6 ]$$

where:

ER =	emission rate (lb/period)
EF =	pollutant specific emission factor (lb/MMBtu)
BHP =	engine rated max brake-horsepower (bhp)
BSFC =	engine brake specific fuel consumption (Btu/bhp-hr)
LCF =	liquid fuel correction factor, LHV to HHV
HPP =	operating hours per time period (hrs/period)

The emission factor is an energy based value using the higher heating value (HHV) of the fuel. As such, an energy based BSFC value must also be based on the HHV. Manufacturer BSFC data are typically based on lower heating value (LHV) data and thus require a conversion (LCF) to the HHV basis. For diesel fuel oil, the HHV values are typically 6 percent greater than the corresponding LHV data. Volume or mass based BSFC data do not need any conversions.

*Crane Engines:* The North pedestal crane is driven by a Detroit Diesel Model 6V-71 engine rated at 230 bhp equipped with "B" type injectors. The use of these injectors coupled with the low operating loads allows this engine to comply with the current Rule 333 NO<sub>x</sub> emission standard of 8.4 g/bhp-hr or 797 ppmv @15% O<sub>2</sub>. Based on the Rule 333-allowed 797 ppmv limit which is used as the compliance limit for source testing, the NO<sub>x</sub> emission factor is 3.02 Lbs/MMBtu. (see Section 10.1 for calculation). The emission factors for PM, CO and ROC are from USEPA AP-42, Table 3.3-1 (10/97), and the SO<sub>x</sub> emission factor is based on mass balance calculation.

The South pedestal crane is driven by a Detroit Diesel Model 3-71 engine rated at 109 bhp. This engine has B-type injectors. The emission factors for PM, CO and ROC are from USEPA AP-42, Table 3.3-1, and the SO<sub>x</sub> emission factor is based on mass balance calculation. For NO<sub>x</sub>, the emission factor is 3.99 lb/MMBtu based on the manufacturer-listed BSFC of 0.420 lb/bhp-hr, and an estimated emission factor of 14 g/bhp-hr.

Both the 21.8 hp diesel IC engine powering the 'Onan' generator and the 49 hp IC engine driving the air compressor are emissions units not subject to any emission control requirements. Both engines are APCD permit-exempt, however, they do not qualify as insignificant Part 70 emissions units. For NO<sub>x</sub> emissions from this engine, the emission factor is 16 g/hp-hr or 4.41 lb/MMBtu based on the estimated BSFC of 8000 Btu/bhp-hr. The emission factors for PM, CO and ROC are from USEPA AP-42, Table 3.3-1, and the SO<sub>x</sub> emission factor is based on mass balance calculation.

The IC engines on the platform are not equipped with diesel fuel flow metering devices. All IC engines are equipped with non-resettable hour meters. The actual engine usage is logged each time the engine is fired. Emissions are calculated using total elapsed run time, the maximum rated engine bhp rating and BSFC data (from Table 5.1-1) to determine the number of gallons consumed per unit time. Ongoing compliance with Rule 333 will be accomplished by quarterly inspections per Section F of this rule, NO<sub>x</sub> and CO measurements with a portable emissions analyzer, and biennial source testing on the North pedestal crane engine.

On June 19, 2008 Rule 333 was revised. The NO<sub>x</sub> emission limit for diesel-fired engines was reduced, and ROC and CO limits were added. In addition, the inspection and maintenance requirements of the Rule were changed. The preexisting emission limits of Rule 333 apply until two years after the revised Rule 333 was added to 40 CFR OCS Part 55. The revised Rule became effective on the OCS on November 21, 2008. Thus, the revised limits will apply starting November 21, 2010. In addition, operators of IC engines are required to submit new or revised Compliance Plans and Inspection and Maintenance plans within six months after the Rule revision became effective on the OCS. These plans are due by May 21, 2009.

*Flare Relief System:* The flare relief system consists of both a high and low pressure header that connects to various PSVs on production and test vessels, compressors, and glycol system. Both planned and unplanned flaring events occur. The flare itself is a John Zink Hydra flare tip, model EEF-SAB-8. The design heat release is 2500 MMBtu/hr. Emission factors for NO<sub>x</sub>, CO and ROC are based on the USEPA AP-42, Table 13.5-1 (9/91). PM emission factors are based on a SBCAPCD flare study. Sulfur oxide emissions are based on mass balance calculations assuming both planned and pilot/purge sulfur levels at 239 ppmv and unplanned flaring sulfur levels at 239 ppmv. The emissions for both planned and unplanned flaring events are calculated. The SO<sub>x</sub> emission factor is determined using the equation: (0.169)(ppmv S)/(HHV). The calculation methodology for the flare is:

$$ER = [ (EF \times SCFPP \times HHV) \div 10^6 ]$$

where: ER = emission rate (lb/period)  
 EF = pollutant specific emission factor (lb/MMBtu)  
 SCFPP = gas flow rate per operating period (scf/period)  
 HHV = gas higher heating value (Btu/scf)

The flare header is equipped with a 8-inch Daniels orifice meter that is capable of detecting flow rates between 0.0075 - 10.00 MMSCFD. The APCD and DCOR have agreed on a low flow, or minimum, detection limit that is equivalent to 315 scfh (based on a velocity of 0.25 std ft/sec) which is higher than the purge/pilot flow rate of 100 scfh. As such, there is no practical method for assessing flow rates between 100 and 315 scfh. Therefore, based on USEPA and CARB's data reporting guidelines, a value of half the minimum detection limit is being assumed as "continuous" planned flaring. The sulfur content of the flared gas is expected to be below 10 ppmv.

### 4.3 Fugitive Hydrocarbon Sources

Emissions of reactive organic compounds from piping components such as valves, flanges and connections have been *assigned* emission factors pursuant to APCD P&P 6100.061 (*Determination of Fugitive Hydrocarbon Emissions at Oil and Gas Facilities Through the Use of Facility Component Counts - Modified for Revised ROC Definition*). The component leak-path was counted consisted with P&P 6100.061. This leak-path count is not the same as the "component" count required by APCD Rule 331. Both gas/light liquid and oil side components are in service at this facility.

The number of emission leak-paths was re-determined in 15 July 2003 by Avanti International under contract to Nuevo. Avanti's data were audited/verified by APCD staff through site checks consisting of sampling and clp counting. A total of 7127 controlled and 40 uncontrolled oil/emulsion component leak-paths (*updated from the previous count of 8048 on 22 March 2000*) and a total of 8028 controlled and 73 uncontrolled gas/light-liquid component leak-paths (*updated from the previous count of 8331 on 22 March 2000*) were found to exist on the platform. The calculation methodology for the fugitive emissions is:

$$ER = [(EF \times CLP \div 24) \times (1 - CE) \times (HPP)]$$

where: ER = emission rate (lb/period)  
 EF = ROC emission factor (lb/clp-day)  
 CLP = component leak-path (clp)  
 CE = control efficiency  
 HPP = operating hours per time period (hrs/period)

An emission control efficiency of 80 percent is credited to all components that are safe to monitor (as defined per Rule 331) due to the implementation of a APCD-approved Inspection and Maintenance program for leak detection and repair consistent with Rule 331 requirements. Unsafe to monitor components are not eligible for I&M control credit. Ongoing compliance is determined in the field by inspection with an organic vapor analyzer and verification of operator records.

#### 4.4 Crew and Supply Vessels

DCOR utilizes both crew boat and supply boats in support of Platform B. For crew and supply boats, DCOR has identified two types of vessels. One type is for primary usage and is controlled for NO<sub>x</sub>. The other type is normally uncontrolled for NO<sub>x</sub> and is used as a spot-charter. The crew boat spot-charter trips are limited to 10 percent of actual crew boat trips. The supply boat spot-charter trips are limited to 10 percent of actual supply boat trips.

The primary supply boats currently assigned to Platform B are the *M/V Santa Cruz* and the *M/V Ryan T* (previously the *M/V Wendy Tide*). For all OCS sources, the typical time in mode for a trip to and from the platform is assumed to be approximately 11 hours (8 hours cruise, 2 hours maneuver, and 1 hour idle). This time includes travel to and from the platform within a 25-mile radius.

The *M/V Santa Cruz* is equipped with two-2,000 bhp (at 1600 rpm) main diesel-fired IC engines (CAT 3516B). These main engines employ the following NO<sub>x</sub> control measures: A Dual Advanced Diesel Engine Management (ADEMII) modules with electronically controlled unit injectors, as well as dual turbo-chargers and a separate circuit after-cooler core. Additional diesel-fired engines on this boat include two-170 kW CAT 3306B DIT generator sets each powered by identical 245 bhp engines; and one bow thruster powered by a CAT 3408C DITA 510 bhp engine. These auxiliary engines are not controlled.

The crew boat assigned to Platform B is the *M/V Alan T* (previously the *M/V Roff Tide*). This vessel is equipped with three-510 bhp main diesel-fired IC engines (Detroit Diesel model 12V-71TI). These engines employ the following NO<sub>x</sub> control measures: four-degree injection timing retard, turbo-charging, and inter-cooling. Additional diesel-fired engines on this vessel include two-30 kW auxiliary generators each powered by identical 109 bhp engines (Detroit Diesel model 3V-71). These auxiliary engines are not controlled.



The permit assesses emission liability based solely on a single emission factor (the cruise mode with a load rating of 65 percent). The supply boat controlled engine has a NO<sub>x</sub> emission factor of 5.99 g/bhp-hr. This converts to a fuel-based NO<sub>x</sub> emission factor of 270 lb/1000 gallons of fuel, assuming a BSFC (engine efficiency number) value of 0.345-lb. fuel/bhp-hr. For crew boat engines with the controls listed above, a full load NO<sub>x</sub> emission factor of 8.4 g/bhp-hr (337 lb/1000 gallons) is used. Sulfur oxide emissions are based on mass balance calculations assuming 0.0015 weight percent sulfur diesel fuel (CARB diesel). Other boat main engine emission factors for ROC and CO are taken from USEPA, AP-42 (Volume II) updated to reflect the larger size of the engine(s). For the auxiliary and bow thruster engines, emission factors are taken from USEPA, AP-42 (Volume I). Uncontrolled NO<sub>x</sub> main engine emission factors for spot-charter supply boat usage are assumed to be 14 g/bhp-hr (561 lb/1000 gallons). The calculation methodology for the crew and supply boat main engine emissions is:

$$ER = [(EF \times EHP \times BSFC \times EL \times TM) \div (10^3)]$$

where:

ER =	emission rate (lbs per period)
EF =	full load pollutant specific emission factor (lb/1000 gallons)
EHP =	engine max rated horsepower (bhp)
BSFC =	engine brake specific fuel consumption (gal/bhp-hr)
EL =	engine load factors (percent of max fuel consumption)
TM =	time in mode (hours/period)

The calculations for the auxiliary engines are similar, except that a 50 percent engine load factor for the generators is utilized. Compliance with the main engine controlled emission rates shall be assessed through emission source testing. Ongoing compliance will be assessed through implementation of the APCD-approved Boat Monitoring and Reporting Plan (approved 4/11/06 and any APCD-approved updates thereof. Total mileage from Platform B to Port Hueneme is approximately 25 miles.

In addition, a permanently assigned emergency response vessel (i.e., the *Clean Seas II*) is associated with Platform B. The total engine horsepower, including auxiliary engines, is 1,770 bhp. Emissions liability is assigned in a prorated fashion among the eleven OCS platforms that utilize the vessel off the Santa Barbara coast. Emission factors, calculations and compliance procedures are the same as for the spot-charter supply vessels discussed above. If used, other emergency response boat fuel usage (and resulting emissions) shall be assessed against this emissions category.

#### **4.5 Tanks/Vessels/Sumps/Separators**

*Tanks:* Platform B has one diesel fuel storage tank and two glycol storage tanks. The diesel storage tank servicing the various IC engines on the platform is not controlled. Diesel tank emissions are small and are assumed to be less than 0.10 tpy (200 lb/year). The glycol storage tanks are also uncontrolled. These tank emissions are small and are assumed to be less than 0.10 tpy (200 lb/yr). The detailed tank calculations for compliance will be performed using the methods presented in USEPA AP-42, Chapter 7.

*Vessels:* Platform B has several pressure vessels (e.g., production separators, test separators, a glycol contactor, shipping tanks, a free water knockout tank, a well clean tank, and scrubbers). All pressure vessels are connected to the platform's gas gathering system. All PSVs, vents, and blow down valves are connected to the flare relief system header. Emissions from pressure vessels are due to fugitive hydrocarbon leaks from valves and connections.

*Sumps:* The waste oil tank (ABJ-451) collects oily liquids from the well clean tank drain. The waste water tank (ABJ-431) receives oily water from the platform deck drains. Vacuum trucks are periodically transported to the platform on the supply boat to remove solids from the waste water tank. A flotation cell unit (ABM-401) processes produced water from the free water knockout tank. Clean water from the flotation cell is pumped to injection wells. The skimmer tank (ABJ-441) receives the oil skimming from the flotation unit and oily water from the well room drains. The waste water tank, waste oil tank, flotation cell unit and skimmer tank emissions are based on the CARB/KVB Report (*Emissions Characteristics of Crude Oil Production in California*, January 1983). These vessels are classified as being in secondary production and heavy oil service and are all vented to the vapor recovery system. The calculation is:

$$ER = [(EF \times SAREA \div 24) \times (1 - CE) \times (HPP)]$$

where:      ER =              emission rate (lb/period)  
                  EF =              ROC emission factor (lb/ft<sup>2</sup>-day)  
                  SAREA =        unit surface area (ft<sup>2</sup>)  
                  CE =              control efficiency  
                  HPP =            operating hours per time period (hrs/period)

*Oil/water separators:* Platform B uses an oil/water separation unit (flotation cell unit) to process oily wastewater. An oil/water separator is defined as a class of wastewater treatment equipment that processes known volumes of waste water on a continuous basis for treatment to remove entrained oil. An uncontrolled emission factor of 560 lb ROC/MMgal of throughput from the CARB/KVB Report (*Emissions Characteristics of Crude Oil Production in California*, January 1983) is used to estimate emissions from the flotation cell unit. The control efficiency is assumed to be, at least, 95 percent. The calculation per time period is:

$$ER = (EF \times Q) \times (1 - CE)$$

where:      ER =              emission rate (lb/period)  
                  EF =              ROC emission factor (lb/MMgallons/period)  
                  Q =                throughput (gallons/period)  
                  CE =              control efficiency

#### 4.6 Vapor Recovery Systems

Gas from the floatation cell unit, glycol unit, waste water tank, skimmer tank, and waste oil tank is compressed by the 80 scfm floatation deck vapor recovery compressor (CBA-291), which discharges to the well clean tank. The well clean tank, which also receives gas from the oil shipping surge tank, is used as the suction scrubber to remove entrained liquids from the gas streams for the 487 scfm main vapor compressor (CBA-202). The gas is compressed to about 30 psig and discharged to the main gas scrubber where the gas is commingled with the gas from the gross oil separators, test separators, and free water knockout. A control efficiency of 95 percent is assigned to the vapor recovery system, pursuant to APCD P&P 6100.030.92.

#### 4.7 Helicopters

Platform B is equipped with a helipad, but helicopters are not used for routine transportation. .  
*Estimated emissions (less than 2 tpy) from this activity have been provided to the APCD.*  
*However, this emissions unit is not included in the permit.*

#### 4.8 Other Emission Sources

The following is a brief discussion of other emission sources on Platform B:

*Pigging:* Pipeline pigging operations occur on the platform. Both pig launching to and pig receiving from Platform A occurs. The pigging frequency is based on that stipulated in ATC/PTO 10139. Emissions occur during the depressurization of these units, since a few ounces of back pressure remain in the chambers, and ROC is emitted when chambers are opened to the atmosphere. It is stipulated in a 5/7/97 letter from Nuevo that the chambers are blanketed with sales gas before opening and the remaining pressure does not exceed 1 psig. The calculation per period is:

$$ER = [V_1 \times \rho \times wt \% \times EPP]$$

<u>where:</u>	ER =	emission rate (lb/period)
	$V_1$ =	volume of vessel (ft <sup>3</sup> )
	$\rho$ =	density of vapor at actual conditions (lb/ft <sup>3</sup> )
	wt % =	weight percent ROC-TOC
	EPP =	pigging events per time period (events/period)

*General Solvent Cleaning/Degreasing:* Solvent usage (not used as thinners for surface coating) occurring on Platform B as part of normal daily operations includes small cold solvent degreasing and wipe cleaning. Mass balance emission calculations are used assuming all the solvent used evaporates to the atmosphere.

*Surface Coating:* Surface coating operations typically include normal touch up activities. Entire platform painting programs are performed once every few years. Emissions are determined based on mass balance calculations assuming all solvents evaporate into the atmosphere. Emission of PM/PM<sub>10</sub> from paint overspray are not calculated due to the lack of established calculation techniques.

*Abrasive Blasting:* Abrasive blasting with CARB certified sands may be performed as a preparation step prior to surface coating. Particulate matter is emitted during this process. A general emission factor of 0.01 pound PM per pound of abrasive is used (SCAQMD - Permit Processing Manual, 1989) to estimate emissions of PM and PM<sub>10</sub>, when needed for compliance evaluations. A PM/PM<sub>10</sub> ratio of 1.0 is assumed.

#### **4.9 BACT/NSPS/NESHAP/MACT**

Except as described below, none of the emission units at Platform B are subject to best available control technology (BACT), NSPS or NESHAP provisions. Also, Maximum Available Control Technology (MACT) standards or monitoring requirements do not apply to any equipment on the platform. However, to retain the MACT exemption under “Black Oil” waiver clause, DCOR must comply with all applicable record-keeping provisions listed under 40 CFR 63, Subpart A. Pursuant to Rule 331.E.1.b, all leaks from critical components are required to be replaced with BACT in accordance with the APCD’s NSR rule.

The following BACT components have been installed:

Date Approved	Rule 331 ID Number	Component Type	Location/ Description	BACT Replacement	LDAR
4/15/98 or 8/14/97	CBA-235	Compressor Seal	300 hp rotary sliding-vane gas compressor	Double Bellows-type Mechanical Sealing System	
3/22/99	95934	Compressor Shaft	Sales Compressor	Dry Running Tandem Seal connected to Vapor Recovery	100 ppm
3/2/99	95687	RAM	Well B-37	Welded. The RAM was removed from service.	100 ppm

#### **4.10 CEMS/Process Monitoring/CAM**

4.10.1 CEMS: There are no CEMS at this facility.

4.10.2 Process Monitoring: In many instances, ongoing compliance beyond a single (snap shot) source test is assessed by the use of process monitoring systems. Examples of these monitors include: engine hour meters, fuel usage meters, water injection mass flow meters, flare gas flow meters and hydrogen sulfide analyzers. Once these process monitors are in place, it is important that they be well maintained and calibrated to ensure that the required accuracy and precision of the devices are within specifications. At a minimum, the following process monitors will be required to be calibrated and maintained in good working order:

- Crew Boat Diesel Fuel Meters (main and auxiliary engines)
- Supply Boat Diesel Fuel Meters (main and auxiliary/bow thruster engines)
- Flare Header Flow Meter
- Hour Meters (cranes, emergency generator)

The above calibration and maintenance requirements shall be implemented according to the *Process Monitor Calibration and Maintenance Plan* (submitted 1/6/95 and any APCD-approved updates thereof). This plan takes into consideration manufacturer recommended maintenance and calibration schedules. Where manufacturer guidance is not available, the recommendations of comparable equipment manufacturers and good engineering judgment shall be utilized.

4.10.3 CAM: None of the emission units at this facility are subject to the requirements of the CAM Rule, per 40 CFR 64.2 (*Applicability*).

#### **4.11 Source Testing/Sampling**

Source testing and sampling are required in order to ensure compliance with permitted emission limits, prohibitory rules, control measures and the assumptions that form the basis of this operating permit. At a minimum, the process streams as identified in Table 4.2 are required to be sampled and analyzed as indicated. Table 4.3 details the pollutants, test methods and frequency of required testing. DCOR will be required to follow the *APCD Source Test Procedures Manual* (May 24, 1990 and all updates). The following emission units are required to be source tested.

- North Crane Engine
- Supply Boat Main Engines
- Crew Boat Main Engines

At a minimum, the process streams as identified in Table 4.2 are required to be sampled and analyzed as indicated. Please see the *Process Stream Sampling and Analysis* condition (9.C.14) for further clarification.

---

**TABLE 4.1 – BACT REQUIREMENTS**

<b>Component</b>	<b>Technology</b>	<b>Performance Standard</b>
Compressor Seal on sliding rotary-vane 300 hp compressor	Double Bellows-type mechanical sealing system, with barrier fluid pressurized 10 psig above the gas compressor discharge pressure.	100 ppm as methane above ambient, monitored per EPA Reference Method 21.

**Table 4.2 Process Stream Sampling Requirements:**

<b>Process Stream</b>	<b>Parameter</b>	<b>Sampling Point</b>	<b>Specific Location **</b>	<b>Methods</b>	<b>Frequency</b>
Produced Gas	1. H <sub>2</sub> S 2. TRS 3. HHV 4. Composition	Production Separator Outlet for all samples	Point located on the 6"-B shipping gas line just prior to gas pig launcher(KAH-703)- Ref. Drwg.# 489-F-107(Plt. 'B')	1. USEPA Method 16 2. USEPA Method 16 3. D 1945 4. D-3588	1. Annual 2. Annual 3. Annual 4. Semi-annual
Produced Oil	1. True vapor pressure (TVP) 2. API Gravity	For all samples, production separator outlet	Point located on the 6"-B shipping oil line just prior to oil pig launcher(KAH-704)- Ref. Drwg.# 489-F-107(Plt. 'B')	1. D-323/D-4057 (or API Bulletin 2519) 2. D-287-82	1. Biennial 2. Biennial

**\*\* --** The above sampling locations, sampling and analytical methods may be revised upon written request from the permittee and approval by the APCD.

**TABLE 4.3 - SOURCE TEST REQUIREMENTS**

<u>Emission Points</u>	<u>Pollutants/ Parameters</u>	<u>Test Methods</u>
- Crane Engine (North)	NO <sub>x</sub>	CARB 1-100 or
- Crew Boat Main Engines	(ppmv, lb/hr)	USEPA 7E
- Supply Boat Main Engines	CO	CARB 1-100 or
	(ppmv, lb/hr)	USEPA 10
	ROC	USEPA 18
	(ppmv, lb/hr)	
	Fuel Flow Rate	Fuel meter for boats; day tank level for crane
	Fuel High Heating Value	ASTM
	Total Sulfur Content	ASTM

Site Specific Requirements

- a. All emissions tests to consist of three 40-minute runs. Crane engine tests to consist of three 20-minute runs. Crane engine to be tested at safe maximum load. Crew and supply boat main engines to be tested at cruise load. Crew boat test runs may be shortened if the boat is used on normal trips to/from the platform. Additional testing may be required if loads are not achieved.
- b. The specific project crew and supply boat to be tested shall be determined by the APCD.
- c. USEPA methods 1-4 to be used to determine O<sub>2</sub>, dry MW, moisture content, CO<sub>2</sub>, and stack flow rate. Alternatively, USEPA 19 may be used to determine flow rate for NO<sub>x</sub> emission rate purpose.
- d. SO<sub>x</sub> emissions to be determined by mass balance calculation.
- e. The main engines from one crew and one supply boat shall be tested annually. The crane engine shall be tested biennially.
- f. Procedures to obtain the required operating loads shall be clearly defined in the source test plan.
- g. Note: Rule 333 limit currently is 797 ppmv @15% O<sub>2</sub>, but will change to 700 ppmv @15%O<sub>2</sub> in the time frame noted in Rule 333 discussion in section 3.4 of this permit. ROC and CO testing will also be required for the North Crane at that time.

## **5. Emissions**

### **5.1 General**

ATC/PTO 11248 (addition of crew and supply boat use conditions and revision of process stream sampling conditions), ATC/PTO 11441 (change in supply boat NO<sub>x</sub> emission limits), and Trn O/O 9111-09 (change of operator), all issued since April 2004, have been incorporated into this PTO 9111-R3. All provisions in the permit were analyzed to determine the permit conditions of PTO 9111, including the permitted emission limits of criteria pollutants from all applicable emission units.

Emissions calculations are divided into "permitted" and "exempt" categories. Permit exempt equipment is determined by APCD Rule 202. The permitted emission for each emissions unit is based on the equipment's potential-to-emit (as defined by Rule 102). Section 5.2 details the permitted emissions for each emissions unit. Section 5.3 details the overall permitted emissions for the facility based on reasonable worst-case scenarios using the potential-to-emit for each emissions unit. Section 5.4 provides the federal potential to emit calculation using the definition of potential to emit used in Rule 1301. Section 5.5 provides the estimated emissions from permit exempt equipment, also serves as the Part 70 list of insignificant emission. Section 5.6 provides the net emissions increase calculation for the facility and the stationary source. In order to track accurately the emissions from a facility, the APCD uses a computer database. Attachment 10.3 contains the APCD's documentation for the information entered in that database.

### **5.2 Permitted Emission Limits - Emission Units**

Each emissions unit associated with the facility was analyzed to determine the potential-to-emit for the following pollutants:

- ⇒ Nitrogen Oxides (NO<sub>x</sub>)<sup>3</sup>
- ⇒ Reactive Organic Compounds (ROC)
- ⇒ Carbon Monoxide (CO)
- ⇒ Sulfur Oxides (SO<sub>x</sub>)<sup>4</sup>
- ⇒ Particulate Matter (PM)<sup>5</sup>
- ⇒ Particulate Matter smaller than 10 microns (PM<sub>10</sub>)

---

<sup>3</sup> Calculated and reported as nitrogen dioxide (NO<sub>2</sub>)

<sup>4</sup> Calculated and reported as sulfur dioxide (SO<sub>2</sub>)

<sup>5</sup> Calculated and reported as all particulate matter smaller than 100 µm



Permitted emissions are calculated for both short term (hourly and daily) and long term (quarterly and annual) time periods. Section 4.0 (Engineering Analysis) provides a general discussion of the basic calculation methodologies and emission factors used. The reference documentation for the specific emission calculations, as well as detailed calculation spreadsheets, may be found in Section 4 and Attachments 10.1 and 10.2 respectively. Table 5.1-1 provides the basic operating characteristics. Table 5.1-2 provides the specific emission factors. Tables 5.1-3 and 5.1-4 show the permitted short-term and permitted long-term emissions for each unit or operation. In the tables, the last column indicates whether the emission limits are federally enforceable. Those emissions limits that are federally enforceable are indicated by the symbol "FE". Those emissions limits that are APCD-only enforceable are indicated by the symbol "A".

### **5.3 Permitted Emission Limits - Facility Totals**

The total potential-to-emit for all emission units associated with the facility was analyzed. This analysis looked at the reasonable worst-case operating scenarios for each operating period. The equipment operating in each of the scenarios are presented below. Unless otherwise specified, the operating characteristics defined in Table 5.1-1 for each emission unit are assumed. Table 5.2 shows the total permitted emissions for the facility.

#### Hourly and Daily Scenario:

- Both 25-ton "North" and 15-ton "South" pedestal crane engines and the stand-by generator
- Flare purge and pilot
- Planned continuous flaring
- Spot charter supply boat
  - Main engines operating at cruise mode
  - Generator engines on supply boat provide half of maximum engine rating
  - Bow thruster on supply boat does not operate during peak hour
- Controlled crew boat
  - Main engines operating at cruise mode
  - Generator engines on crew boat provide half of maximum engine rating
- Fugitive components
- Oil pig launcher
- Waste oil sump
- Flotation cell unit
- Skimmer tank
- Waste water tank
- Solvent usage

#### Quarterly and Annual Scenario:

- Both "North" and "South" pedestal crane engines and the stand-by generator
- Flare purge and pilot
- Planned continuous flaring
- Planned intermittent (other) flaring
- Unplanned flaring
- Controlled and Uncontrolled supply boat
  - Main engines operating at cruise mode
  - Generator engines on supply boat provide half of maximum engine rating

- Bow thruster
- Controlled and Uncontrolled crew boat
  - Main engines operating at cruise mode
  - Auxiliary engines on crew boat provide half of maximum engine rating
- Man Overboard Vessel
- Fugitive components
- Pig launchers and receivers
- Waste oil sump
- Flotation cell unit
- Skimmer tank
- Waste water tank
- Solvent usage

#### **5.4 Part 70: Federal Potential to Emit for the Facility**

Table 5.3 lists the federal Part 70 potential to emit. Being subject to the OCS Air Regulation, all project emissions, except fugitive emissions, are counted in the federal definition of potential to emit. However, fugitives are counted in the federal PTE if the facility is subject to any applicable NSPS or NESHAP requirement. As noted earlier, Platform B is not subject to any NSPS/NESHAP requirements.

#### **5.5 Exempt Emission Sources/Part 70 Insignificant Emissions**

Equipment/activities exempt from APCD permits pursuant to Rule 202 include:

- ‘Onan’ electrical generator engine (21.8 bhp diesel-fired IC engine)
- 49 hp IC engine powering the portable air compressor
- Diesel fuel #2 storage tank, 3200 gallons capacity
- Maintenance operations involving surface coating/solvents (painting /wipe cleaning)
- Solvents used for wipe cleaning

*Insignificant emission units* are defined under APCD Rule 1301 as any regulated air pollutant emitted from the unit, excluding HAPs, that are less than 2 tons per year based on the unit’s potential to emit and any HAP regulated under section 112(g) of the Clean Air Act that does not exceed 0.5 ton per year based on the unit’s potential to emit. The following emission units are exempt from permit per Rule 202, but are not considered insignificant emission units:

- Coating/Solvents used for maintenance type operations, if usage exceeds 1,150 gallons/year
- ‘Onan’ electrical generator engine (21.8 bhp diesel-fired IC engine); (also, the 49 hp IC engine powering the portable air compressor, included in PTO 9110)
- 49 hp IC engine powering the portable air compressor

Table 5.4 presents the estimated annual emissions from these exempt equipment items, including those exempt items not considered insignificant. This permit covers the Solvents/Surface coating operations not classed as maintenance operations (see Section 9.C). *Please note that non-maintenance activities using solvents and surface coating are not permit-exempt.*

## 5.6 Net Emissions Increase Calculation

This facility's net emissions increase since November 15, 1990 (the day the federal Clean Air Act Amendments was adopted in 1990) is based on the following NSR permit actions since December 5, 1991:

	ROC NEI (lbs./day)	ROC NEI (tons/year)
• ATC/PTO 9889 (5/4/97)	18.48	3.37
• ATC/PTO 10089 (3/30/99)	0.00	0.00
• ATC/PTO 10139 (11/30/99)	0.00	0.00
TOTAL:	18.48	3.37

	NOx NEI (lbs./day)	NOx NEI (tons/year)
• ATC/PTO 11441 (3/30/05)	0.00	0.16
TOTAL:	0.00	0.16

NEI for other pollutants are zero for Platform B. The aggregate NEI for Platform B is shown in Table 5.5 and in Table 5 of Attachment 10.3.

Aggregate NEI for DCOR South County OCS stationary source is listed in the Table below.

Table Showing Net Emissions Increases at Dos Cuadras - South County Platforms

	NO <sub>x</sub>	ROC	CO	SO <sub>x</sub>	TSP	PM <sub>10</sub>
PLATFORM A – PTO 9114-R3: Reeval issued in March 2009						
lb/day		11.48				
tons/year	0.16	2.10				
PLATFORM B – PTO 9111-R3: Reeval issued in March 2009						
lb/day		18.48				
tons/year	0.16	3.37				
PLATFORM C – PTO 9112-R3: Reeval issued in March 2009						
lb/day		1.53				
tons/year	0.16	0.28				
PLATFORM HENRY – PTO 9113-R3: Reeval issued in March 2009						
lb/day		2.66				
tons/year	0.16	0.49				
PLATFORM HILLHOUSE – PTO 9114-R3: Reeval issued in March 2009						
lb/day		13.97				
tons/year	0.16	2.51				
TOTAL NEI FOR ALL PLATFORMS AT DCOR OCS:						
lb/day		<b>48.12</b>				
tons/year	0.80	<b>8.75</b>				

References: Tables 5.5 in PTO's, 9110, 9111, 9112, 9113 and 9114

**THIS PAGE LEFT BLANK INTENTIONALLY**

**Table 5.1-1**  
**Dos Cuadras Platform B - PTO 9111-R3**  
**Operating Equipment Description**

Equipment Category	Description	APCD Device No.	Device Specifications				Usage Data				Maximum Operating Schedule				References
			Fuel	% S	Size	Units	Capacity	Units	Load	hr	day	qtr	year		
Combustion - Engines	North Crane (25-ton)	4887	D2	0.0015	230	bhp	7,241	Btu/bhp-hr	--	1.0	24	500	1,000	A	
	South Crane (15-ton)	4886	D2	0.0015	109	bhp	7,700	Btu/bhp-hr	--	1.0	24	100	200		
Combustion - Flare	Purge and Pilot	5506	PG	0.0239	100	scfh	0.110	MMBtu/hr	--	1.0	24	2,190	8,760	B	
	Planned - continuous	--	PG	0.0239	158	scfh	0.173	MMBtu/hr	--	1.0	24	2,190	8,760		
	Planned - other	--	PG	0.0239	2,500	MMBtu/hr	26.393	MMscf/yr	--	--	--	1	1		
	Unplanned	--	PG	0.0239	2,500	MMBtu/hr	26.393	MMscf/yr	--	--	--	1	1		
Fugitive Components	Oil - controlled	102167	--	--	7,127	comp-lp	--	--	--	1.0	24	2,190	8,760	C	
	Oil - unsafe	102168	--	--	40	comp-lp	--	--	--	1.0	24	2,190	8,760		
	Gas - controlled	102165	--	--	8,028	comp-lp	--	--	--	1.0	24	2,190	8,760		
	Gas - unsafe	102166	--	--	73	comp-lp	--	--	--	1.0	24	2,190	8,760		
Supply Boat	Main Engines - con	5507	D2	0.0015	4,000	bhp-total	0.049	gal/bhp-hr	0.65	1.0	11	57	114	D	
	Main Engines - uncon	110624	D2	0.0015	4,000	bhp-total	0.055	gal/bhp-hr	0.65	1.0	11	6	11		
	Generator Engines	5508	D2	0.0015	490	bhp-total	0.055	gal/bhp-hr	0.50	1.0	11	57	114		
	Bow Thruster	5509	D2	0.0015	515	bhp-total	0.055	gal/bhp-hr	1.00	1.0	2	10	21		
	Emergency Response	5510	D2	0.0015	1,770	bhp-total	0.055	gal/bhp-hr	0.65	--	--	18	72		
Crew Boat	Main Engines - con	5511	D2	0.0015	1,530	bhp-total	0.055	gal/bhp-hr	0.85	1.0	18	263	1,050	E1	
	Main Engines - uncon	110623	D2	0.0015	1,530	bhp-total	0.055	gal/bhp-hr	0.85	1.0	18	26	105		
	Auxiliary Engines	5512	D2	0.0015	218	bhp-total	0.055	gal/bhp-hr	0.50	1.0	18	263	1,050		
Pigging Equipment	Oil Launcher	102147	--	--	10	cf	1	psig	--	1	1	40	160	F	
	Gas Launcher	102148	--	--	10	cf	1	psig	--	1	1	40	160		
	Oil Receiver	102150	--	--	2	cf	1	psig	--	1	1	40	160		
	Gas Receiver	102149	--	--	2	cf	1	psig	--	1	1	40	160		
Sumps/Tanks/Separators	Waste Oil Sump	5513	--	--	13	ft2	--	--	--	1.0	24	2,190	8,760	G	
	Flotation Cell Unit	5514	--	--	1.60	MMgal/day	--	--	--	1.0	24	2,190	8,760		
	Skimmer Tank	5515	--	--	38	ft2	--	--	--	1.0	24	2,190	8,760		
	Waste Water Tank	5516	--	--	50	ft2	--	--	--	1.0	24	2,190	8,760		
Solvent Usage	Cleaning/degreasing	4901	--	--	--	--	3,009	gal/yr	--	1.0	24	2,190	8,760	H	
Permit-exempt/Fed. Significant Unit	Exempt Onan Generator	102098	D2	0.0015	21.8	bhp	8,000	Btu/hp-hr	--	1.0	24	2,190	8,760	8,760	
	Exempt Air Compressor	110757	D2	0.0015	49	bhp	8,000	Btu/hp-hr	--	1.0	24	2,190	8,760		

**Table 5.1-2**  
**Dos Cuadras Platform B - PTO 9111-R3**  
**Equipment Emission Factors**

Equipment Category	Description	APCD Device No.	Emission Factors							References
			NOx	ROC	CO	SOx	PM	PM10	Units	
Combustion - Engines	North Crane	4887	3.02	0.30	0.95	0.000015	0.31	0.31	lb/MMBtu	A
	South Crane	4886	4.01	0.30	0.95	0.000015	0.31	0.31	lb/MMBtu	
Combustion - Flare	Purge and Pilot	5506	0.068	0.057	0.37	0.037	0.02	0.02	lb/MMBtu	B
	Planned - continuous	--	0.068	0.057	0.37	0.037	0.02	0.02	lb/MMBtu	
	Planned - other	--	0.068	0.057	0.37	0.037	0.02	0.02	lb/MMBtu	
	Unplanned	--	0.068	0.057	0.37	0.037	0.02	0.02	lb/MMBtu	
Fugitive Components	Oil - controlled	102167	--	0.0009	--	--	--	--	lb/day-clp	C
	Oil - unsafe	102168	--	0.0044	--	--	--	--	lb/day-clp	
	Gas - controlled	102165	--	0.0147	--	--	--	--	lb/day-clp	
	Gas - unsafe	102166	--	0.0736	--	--	--	--	lb/day-clp	
Supply Boat	Main Engines - con	5507	269.9	16.8	78.3	0.2115	33.0	33.0	lb/1000 gal	D
	Main Engines - uncon	110624	561.2	16.8	78.3	0.2115	33.0	33.0	lb/1000 gal	
	Generator Engines	5508	600.0	41.0	129.3	0.2115	42.2	42.2	lb/1000 gal	
	Bow Thruster	5509	600.0	41.0	129.3	0.2115	42.2	42.2	lb/1000 gal	
	Emergency Response	5510	561.2	16.8	78.3	0.2115	33.0	33.0	lb/1000 gal	
Crew Boat	Main Engines - con	5511	337	42.3	99.7	0.2115	33.0	31.7	lb/1000 gal	E1
	Main Engines - uncon	110623	561	42.3	99.7	0.2115	33.0	31.7	lb/1000 gal	
	Auxiliary Engines	5512	600	41.0	129.3	0.2115	42.2	40.5	lb/1000 gal	
Pigging Equipment	Oil Launcher	102147	--	0.0096	--	--	--	--	lb/acf-evnt	F
	Gas Launcher	102148	--	0.0096	--	--	--	--	lb/acf-evnt	
	Oil Receiver	102150	--	0.0098	--	--	--	--	lb/acf-evnt	
	Gas Receiver	102149	--	0.0098	--	--	--	--	lb/acf-evnt	
Sumps/Tanks/Separators	Waste Oil Sump	5513	--	0.001	--	--	--	--	lb/ft2-day	G
	Flotation Cell Unit	5514	--	28.000	--	--	--	--	lb/MMgal-day	
	Skimmer Tank	5515	--	0.001	--	--	--	--	lb/ft2-day	
	Waste Water Tank	5516	--	0.001	--	--	--	--	lb/ft2-day	
Solvent Usage	Cleaning/degreasing	4901	--	6.7	--	--	--	--	lb/gal	H
Permit-exempt/Fed. Significant Unit	Exempt Onan Generator	102098	4.41	0.30	0.95	0.00	0.31	0.31	lb/MMBtu	
	Exempt Air Compressor	110757	4.41	0.30	0.95	0.00	0.31	0.30	lb/MMBtu	

**Table 5.1-3**  
**Dos Cuadras Platform B - PTO 9111-R3**  
**Hourly and Daily Emissions**

Equipment Category	Description	APCD Device No.	NOx		ROC		CO		SOx		PM		PM10		Federally Enforceable
			lb/hr	lb/day	lb/hr	lb/day	lb/hr	lb/day	lb/hr	lb/day	lb/hr	lb/day	lb/hr	lb/day	
Combustion - Engines	North Crane	4887	5.34	128.08	0.53	12.78	1.68	40.25	0.00	0.00	0.55	13.13	0.55	13.13	FE
	South Crane	4886	3.57	85.59	0.27	6.44	0.85	20.28	0.00	0.00	0.28	6.62	0.28	6.62	FE
Combustion - Flare	Purge and Pilot	5506	0.01	0.18	0.01	0.15	0.04	0.98	0.00	0.10	0.00	0.05	0.00	0.05	FE
	Planned - continuous	--	0.01	0.28	0.01	0.24	0.06	1.54	0.01	0.15	0.00	0.08	0.00	0.08	FE
	Planned - other	--	--	--	--	--	--	--	--	--	--	--	--	--	FE
	Unplanned	--	--	--	--	--	--	--	--	--	--	--	--	--	FE
Fugitive Components	Oil - controlled	102167	--	--	0.26	6.26	--	--	--	--	--	--	--	--	FE
	Oil - unsafe	102168	--	--	0.01	0.18	--	--	--	--	--	--	--	--	FE
	Gas - controlled	102165	--	--	4.92	118.16	--	--	--	--	--	--	--	--	FE
	Gas - unsafe	102166	--	--	0.22	5.37	--	--	--	--	--	--	--	--	FE
Supply Boat	Main Engines - con	5507	34.33	377.68	2.14	23.51	9.96	109.59	0.03	0.30	4.20	45.19	4.20	46.19	FE
	Main Engines - uncon	110624	80.25	882.72	2.40	26.43	11.20	123.17	0.03	0.33	4.72	51.91	4.72	51.91	FE
	Generator Engines	5508	8.09	88.94	0.55	6.08	1.74	19.16	0.00	0.03	0.57	6.25	0.57	6.25	FE
	Bow Thruster	5509	17.00	33.99	1.16	2.32	3.66	7.32	0.01	0.01	1.19	2.39	1.19	2.39	FE
	Emergency Response	5510	--	--	--	--	--	--	--	--	--	--	--	--	FE
Crew Boat	Main Engines - con	5511	24.08	421.46	3.02	52.92	7.13	124.80	0.02	0.26	2.36	41.31	2.27	39.65	FE
	Main Engines - uncon	110623	40.14	702.43	3.02	52.92	7.13	124.80	0.02	0.26	2.36	41.31	2.27	39.65	FE
	Auxiliary Engines	5512	3.60	62.95	0.25	4.31	0.77	13.56	0.00	0.02	0.25	4.43	0.24	4.25	FE
Pigging Equipment	Oil Launcher	102147	--	--	0.10	0.10	--	--	--	--	--	--	--	--	FE
	Gas Launcher	102148	--	--	0.10	0.10	--	--	--	--	--	--	--	--	FE
	Oil Receiver	102150	--	--	0.01	0.01	--	--	--	--	--	--	--	--	FE
	Gas Receiver	102149	--	--	0.01	0.01	--	--	--	--	--	--	--	--	FE
Sumps/Tanks/Separators	Waste Oil Sump	5513	--	--	0.00	0.01	--	--	--	--	--	--	--	--	FE
	Flotation Cell Unit	5514	--	--	1.86	44.69	--	--	--	--	--	--	--	--	FE
	Skimmer Tank	5515	--	--	0.00	0.02	--	--	--	--	--	--	--	--	FE
	Waste Water Tank	5516	--	--	0.00	0.03	--	--	--	--	--	--	--	--	FE
Solvent Usage	Cleaning/degreasing	4901	--	--	6.90	55.23	--	--	--	--	--	--	--	--	FE
Permit-exempt/Fed. Significant Unit	Exempt Onan Generator	102098	0.82	19.56	0.06	1.34	0.18	4.21	0.00	0.00	0.06	1.38	0.06	1.38	
	Exempt Air Compressor	110757	1.83	43.98	0.12	2.99	0.39	9.47	0.00	0.00	0.13	3.09	0.12	2.99	

**Table 5.1-4**  
**Dos Cuadras Platform B - PTO 9111-R3**  
**Quarterly and Annual Emissions**

Equipment Category	Description	APCD Device No.	NOx		ROC		CO		SOx		PM		PM10		Federally Enforceable
			TPQ	TPY	TPQ	TPY	TPQ	TPY	TPQ	TPY	TPQ	TPY	TPQ	TPY	
Combustion - Engines	North Crane	4887	1.33	2.67	0.13	0.27	0.42	0.84	0.00	0.00	0.14	0.27	0.14	0.27	FE
	South Crane	4886	0.18	0.36	0.01	0.03	0.04	0.08	0.00	0.00	0.01	0.03	0.01	0.03	FE
Combustion - Flare	Purge and Pilot	5506	0.01	0.03	0.01	0.03	0.04	0.18	0.00	0.02	0.00	0.01	0.00	0.01	FE
	Planned - continuous	--	0.01	0.05	0.01	0.04	0.07	0.28	0.01	0.03	0.00	0.02	0.00	0.02	FE
	Planned - other	--	1.18	1.18	1.00	1.00	6.44	6.44	0.64	0.64	0.35	0.35	0.35	0.35	FE
	Unplanned	--	1.18	1.18	1.00	1.00	6.44	6.44	0.64	0.64	0.35	0.35	0.35	0.35	FE
Fugitive Components	Oil - controlled	102167	--	--	0.29	1.14	--	--	--	--	--	--	--	--	FE
	Oil - unsafe	102168	--	--	0.01	0.03	--	--	--	--	--	--	--	--	FE
	Gas - controlled	102165	--	--	5.39	21.56	--	--	--	--	--	--	--	--	FE
	Gas - unsafe	102166	--	--	0.25	0.98	--	--	--	--	--	--	--	--	FE
Supply Boat	Main Engines - con	5507	0.98	1.96	0.06	0.12	0.28	0.57	0.00	0.00	0.12	0.24	0.12	0.24	FE
	Main Engines - uncon	110624	0.23	0.46	0.01	0.01	0.03	0.06	0.00	0.00	0.01	0.03	0.01	0.03	FE
	Generator Engines	5508	0.23	0.46	0.02	0.03	0.05	0.10	0.00	0.00	0.02	0.03	0.02	0.03	FE
	Bow Thruster	5509	0.09	0.18	0.01	0.01	0.02	0.04	0.00	0.00	0.01	0.01	0.01	0.01	FE
	Emergency Response	5510	0.32	1.28	0.01	0.04	0.04	0.18	0.00	0.00	0.02	0.08	0.02	0.08	FE
															FE
Crew Boat	Main Engines - con	5511	3.16	12.64	0.40	1.59	0.94	3.74	0.00	0.01	0.31	1.24	0.30	1.19	FE
	Main Engines - uncon	110623	0.53	2.11	0.04	0.16	0.09	0.37	0.00	0.00	0.03	0.12	0.03	0.12	FE
	Auxiliary Engines	5512	0.47	1.89	0.03	0.13	0.10	0.41	0.00	0.00	0.03	0.13	0.03	0.13	FE
Pigging Equipment	Oil Launcher	102147	--	--	0.00	0.01	--	--	--	--	--	--	--	--	FE
	Gas Launcher	102148	--	--	0.00	0.01	--	--	--	--	--	--	--	--	FE
	Oil Receiver	102150	--	--	0.00	0.00	--	--	--	--	--	--	--	--	FE
	Gas Receiver	102149	--	--	0.00	0.00	--	--	--	--	--	--	--	--	FE
Sumps/Tanks/Separators	Waste Oil Sump	5513	--	--	0.00	0.00	--	--	--	--	--	--	--	--	FE
	Flotation Cell Unit	5514	--	--	2.04	8.16	--	--	--	--	--	--	--	--	FE
	Skimmer Tank	5515	--	--	0.00	0.00	--	--	--	--	--	--	--	--	FE
	Waste Water Tank	5516	--	--	0.00	0.01	--	--	--	--	--	--	--	--	FE
			--	--			--	--	--	--	--	--	--	--	FE
Solvent Usage	Cleaning/degreasing	4901	--	--	2.52	10.08	--	--	--	--	--	--	--	--	FE
Permit-exempt/Fed Significant Unit	Exempt Onan Generator	102098	0.89	3.57	0.06	0.24	0.19	0.77	0.00	0.00	0.06	0.25	0.06	0.25	
	Exempt Air Compressor	110757	2.01	8.03	0.14	0.55	0.43	1.73	0.00	0.00	0.14	0.56	0.14	0.55	



**Table 5.2**  
**Dos Cuadras Platform B - PTO 9111-R3**  
**Total Permitted Facility Emissions**

**A. HOURLY (lb/hr)**

Equipment Category	NOx	ROC	CO	SOx	PM	PM10
Combustion - Engines	8.90	0.80	2.52	0.00	0.82	0.82
Combustion - Flare	0.02	0.02	0.10	0.01	0.01	0.01
Fugitive Components	--	5.41	--	--	--	--
Supply Boat	88.33	2.96	12.94	0.03	5.29	5.29
Emergency Response	--	--	--	--	--	--
Crew Boat	43.74	3.27	7.91	0.02	2.61	2.51
Pigging	--	0.22	--	--	--	--
Sumps/Tanks/Separators	--	1.86	--	--	--	--
Solvent Usage	--	6.90	--	--	--	--
	140.99	21.45	23.47	0.06	8.73	8.62

**B. DAILY (lb/day)**

Equipment Category	NOx	ROC	CO	SOx	PM	PM10
Combustion - Engines	213.67	19.22	60.54	0.00	19.75	19.75
Combustion - Flare	0.46	0.39	2.52	0.25	0.14	0.14
Fugitive Components	--	129.96	--	--	--	--
Supply Boat	1,005.65	34.83	149.65	0.38	60.55	60.55
Emergency Response	--	--	--	--	--	--
Crew Boat	765.38	57.22	138.36	0.29	45.73	43.90
Pigging	--	0.22	--	--	--	--
Sumps/Tanks/Separators	--	44.75	--	--	--	--
Solvent Usage	--	55.23	--	--	--	--
	1,985.16	341.83	351.06	0.91	126.17	124.34

**C. QUARTERLY (tpq)**

Equipment Category	NOx	ROC	CO	SOx	PM	PM10
Combustion - Engines	1.51	0.15	0.46	0.00	0.15	0.15
Combustion - Flare	2.39	2.01	12.99	1.29	0.70	0.70
Fugitive Components	--	5.93	--	--	--	--
Supply Boat	1.53	0.09	0.39	0.00	0.16	0.16
Emergency Response	0.32	0.01	0.04	0.00	0.02	0.02
Crew Boat	4.16	0.47	1.13	0.00	0.37	0.36
Pigging	--	0.00	--	--	--	--
Sumps/Tanks/Separators	--	2.04	--	--	--	--
Solvent Usage	--	2.52	--	--	--	--
	9.91	13.23	15.01	1.29	1.40	1.39

**D. ANNUAL (tpy)**

Equipment Category	NOx	ROC	CO	SOx	PM	PM10
Combustion - Engines	3.02	0.29	0.92	0.00	0.30	0.30
Combustion - Flare	2.45	2.07	13.33	1.32	0.72	0.72
Fugitive Components	--	23.72	--	--	--	--
Supply Boat	3.06	0.18	0.77	0.00	0.31	0.31
Emergency Response	1.28	0.04	0.18	0.00	0.08	0.08
Crew Boat	16.64	1.88	4.53	0.01	1.50	1.44
Pigging	--	0.02	--	--	--	--
Sumps/Tanks/Separators	--	8.17	--	--	--	--
Solvent Usage	--	10.08	--	--	--	--
	26.45	46.44	19.73	1.33	2.90	2.84

**Table 5.3**  
**Dos Cuadras Platform B - PTO 9111-R3**  
**Federal Potential to Emit**

**A. PEAK HOURLY (lb/hr)**

Equipment Category	NOx	ROC	CO	SOx	PM	PM10
Combustion - Engines	8.90	0.80	2.52	0.00	0.82	0.82
Combustion - Flare	0.02	0.02	0.10	0.01	0.01	0.01
Fugitive Components	--	--	--	--	--	--
Supply Boat	88.33	2.96	12.94	0.03	5.29	5.29
Emergency Response	--	--	--	--	--	--
Crew Boat	43.74	3.27	7.91	0.02	2.61	2.51
Pigging	--	0.22	--	--	--	--
Sumps/Tanks/Separators	--	--	--	--	--	--
Solvent Usage	--	6.90	--	--	--	--
Permit-exempt/Fed. Significant Unit	2.65	0.18	0.57	0.00	0.19	0.18
	143.64	14.35	24.04	0.06	8.92	8.81

**B. PEAK DAILY (lb/day)**

Equipment Category	NOx	ROC	CO	SOx	PM	PM10
Combustion - Engines	213.67	19.22	60.54	0.00	19.75	19.75
Combustion - Flare	0.46	0.39	2.52	0.25	0.14	0.14
Fugitive Components	--	--	--	--	--	--
Supply Boat	1,005.65	34.83	149.65	0.38	60.55	60.55
Emergency Response	--	--	--	--	--	--
Crew Boat	765.38	57.22	138.36	0.29	45.73	43.90
Pigging	--	0.22	--	--	--	--
Sumps/Tanks/Separators	--	--	--	--	--	--
Solvent Usage	--	55.23	--	--	--	--
Permit-exempt/Fed. Significant Unit	63.54	4.33	13.69	0.00	4.47	4.37
	2,048.70	171.45	364.75	0.91	130.64	128.71

**C. PEAK QUARTERLY (tpq)**

Equipment Category	NOx	ROC	CO	SOx	PM	PM10
Combustion - Engines	1.51	0.15	0.46	0.00	0.15	0.15
Combustion - Flare	2.39	2.01	12.99	1.29	0.70	0.70
Fugitive Components	--	--	--	--	--	--
Supply Boat	1.53	0.09	0.39	0.00	0.16	0.16
Emergency Response	0.32	0.01	0.04	0.00	0.02	0.02
Crew Boat	4.16	0.47	1.13	0.00	0.37	0.36
Pigging	--	0.00	--	--	--	--
Sumps/Tanks/Separators	--	--	--	--	--	--
Power Production Generator	0.74	0.07	0.16	0.05	0.05	0.04
Diesel Storage Tanks	--	0.10	--	--	--	--
Surface Coating - Maintenance	--	0.13	--	--	--	--
Solvent Usage	--	2.52	--	--	--	--
Permit-exempt/Fed. Significant Unit	2.90	0.20	0.62	0.00	0.20	0.20
	13.55	5.75	15.79	1.34	1.66	1.63

**D. PEAK ANNUAL (tpy)**

Equipment Category	NOx	ROC	CO	SOx	PM	PM10
Combustion - Engines	3.02	0.29	0.92	0.00	0.30	0.30
Combustion - Flare	2.45	2.07	13.33	1.32	0.72	0.72
Fugitive Components	--	--	--	--	--	--
Supply Boat	3.06	0.18	0.77	0.00	0.31	0.31
Emergency Response	1.28	0.04	0.18	0.00	0.08	0.08
Crew Boat	16.64	1.88	4.53	0.01	1.50	1.44
Pigging	--	0.02	--	--	--	--
Sumps/Tanks/Separators	--	--	--	--	--	--
Power Production Generator	2.95	0.51	0.64	0.20	0.21	0.18
Diesel Storage Tanks	--	0.10	--	--	--	--
Surface Coating - Maintenance	--	0.13	--	--	--	--
Solvent Usage	--	10.08	--	--	--	--
Permit-exempt/Fed. Significant Unit	11.60	0.79	2.50	0.00	0.82	0.80
	41.00	16.08	22.87	1.53	3.93	3.82

**Table 5.4**  
**Dos Cuadras Platform B - PTO 9111-R3**  
**Estimated Permit Exempt Emissions**

**A. QUARTERLY (tpq)**

<b>Equipment Category</b>	<b>NOx</b>	<b>ROC</b>	<b>CO</b>	<b>SOx</b>	<b>PM</b>	<b>PM10</b>
Onan Generator	0.89	0.06	0.19	0.00	0.06	0.06
Air Compressor	2.01	0.14	0.43	0.00	0.14	0.14
Diesel Storage Tanks	--	0.10	--	--	--	--
Surface Coating - Maintenance	--	0.13	--	--	--	--
	2.90	0.43	0.62	0.00	0.20	0.20

**B. ANNUAL (tpy)**

<b>Equipment Category</b>	<b>NOx</b>	<b>ROC</b>	<b>CO</b>	<b>SOx</b>	<b>PM</b>	<b>PM10</b>
Onan Generator	3.57	0.24	0.77	0.00	0.25	0.25
Air Compressor	8.03	0.55	1.73	0.00	0.56	0.55
Diesel Storage Tanks	--	0.10	--	--	--	--
Surface Coating - Maintenance	--	0.13	--	--	--	--
	11.60	1.02	2.50	0.00	0.82	0.80

**Table 5.5**  
**Dos Cuadras Platform B - PTO 9111-R3**  
**Net Emissions Increase**

**A. DAILY (lb/day)**

Equipment Category	NOx	ROC	CO	SOx	PM	PM10
Combustion - Engines	----	----	----	----	----	----
Combustion - Flare	----	----	----	----	----	----
Fugitive Components	----	----	----	----	----	----
Supply Boat	----	----	----	----	----	----
Emergency Response	----	----	----	----	----	----
Crew Boat	----	----	----	----	----	----
Pigging	----	----	----	----	----	----
Sumps/Tanks/Separators	----	18.48	----	----	----	----
Solvent Usage	----	----	----	----	----	----
	0.00	18.48	0.00	0.00	0.00	0.00

**B. ANNUAL (tpy)**

Equipment Category	NOx	ROC	CO	SOx	PM	PM10
Combustion - Engines	----	----	----	----	----	----
Combustion - Flare	----	----	----	----	----	----
Fugitive Components	----	----	----	----	----	----
Supply Boat	0.16	----	----	----	----	----
Emergency Response	----	----	----	----	----	----
Crew Boat	----	----	----	----	----	----
Pigging	----	----	----	----	----	----
Sumps/Tanks/Separators	----	3.37	----	----	----	----
Solvent Usage	----	----	----	----	----	----
	0.16	3.37	0.00	0.00	0.00	0.00

Notes:

1. The daily and annual NEI for ROC are based on ATC/PTO 9889 (issued 5/4/97).
2. The annual NEI for Nox is based on ATC/PTO 11441 (issued 3/30/05).

## **6.0 Air Quality Impact Analyses**

### **6.1 *Modeling***

Air quality modeling was not required for this stationary source.

### **6.2 *Increments***

An air quality increment analysis was not required for this stationary source.

### **6.3 *Monitoring***

Air quality monitoring is not required for this stationary source.

### **6.4 *Health Risk Assessment***

A Health Risk Assessment was not required for this stationary source.

## **7.0 CAP Consistency, Offset Requirements and ERCs**

### **7.1 General**

Santa Barbara County is in attainment for the federal ozone standard, but is nonattainment for the state ozone ambient 8-hour air quality standard. In addition, the County is nonattainment with the state PM<sub>10</sub> ambient air quality standard. Therefore, emissions from all emission units at the stationary source and its constituent facilities must be consistent with the provisions of the USEPA and State approved Clean Air Plans (CAP) and must not interfere with progress towards maintenance of the federal and attainment of the state ambient air quality standards. Under APCD regulations, any modifications at the South Cuyama Unit (or the E&B stationary source) that result in an emissions increase of any nonattainment pollutant exceeding 25 lbs/day must apply BACT (NAR). Additional increases may trigger offsets at the source or elsewhere so that there is a net air quality benefit for Santa Barbara County. These offset threshold levels are 55 lbs/day for all non-attainment pollutants except PM<sub>10</sub> for which the level is 80 lbs/day.

### **7.2 Clean Air Plan**

Santa Barbara County's air quality has historically violated both the state and federal ozone standards. Since 1999, however, local air quality data show that every monitoring location in the County complied with the federal one-hour ambient air quality standard for ozone. The Santa Barbara County Air Pollution Control District adopted the 2001 Clean Air Plan (2001 CAP) that demonstrated attainment of the federal one-hour ozone standard and continued maintenance of that standard through 2015. Consequently, on August 8, 2003, the United States Environmental Protection Agency (USEPA) designated Santa Barbara County as an attainment area for the federal one-hour ozone standard.

On June 15, 2004, USEPA replaced the federal one-hour ozone standard with an eight-hour ozone standard for Santa Barbara County and most parts of the country. This eight-hour ozone standard, originally promulgated by USEPA on July 18, 1997, is set at 0.08 parts per million measured over eight hours and is more protective of public health and more stringent than the federal one-hour standard. For the purposes of the federal eight-hour ozone standard, Santa Barbara County has been designated attainment.

On August 16, 2007 the APCD Board adopted the 2007 Clean Air Plan to chart a course of action that will provide for ongoing maintenance of the federal eight-hour ozone standard through the year 2014 as well as the expeditious attainment of the state one-hour ozone standard. These plans have been developed for Santa Barbara County as required by both the 1998 California Clean Air Act and the 1990 Federal Clean Air Act Amendments.

### **7.3 Offset Requirements**

The *Dos Cuadras - South County* stationary source does not currently require emission offsets.

### **7.4 Emission Reduction Credits**

The *Dos Cuadras - South County* stationary source does not generate or provide emission reduction credits.

## **8.0 Lead Agency Permit Consistency**

The United States Department of Interior's Minerals Management Service approved the *Plan of Development* for DCOR's Platform B on May 6, 1968.

## 9.0 Permit Conditions

This section lists the applicable permit conditions for Platform B. Section A lists the standard administrative conditions. Section B lists 'generic' permit conditions, including emission standards, for all equipment in this permit. Section C lists conditions affecting specific equipment. Section D lists non-federally enforceable (i.e., APCD only) permit conditions. Conditions listed in Sections A, B, and C are enforceable by the USEPA, the APCD, the State of California and the public. Conditions listed in Section D are enforceable only by the APCD and the State of California. Where any reference contained in Sections 9.A, 9.B, or 9.C refers to any other part of this permit, that part of the permit referred to is federally enforceable. In case of a discrepancy between the wording of a condition and the applicable federal or APCD rule(s), the wording of the rule shall control.

For the purposes of submitting compliance certifications or establishing whether or not a person has violated or is in violation of any standard in this permit, nothing in the permit shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test had been performed.

### 9.A Standard Administrative Conditions

The following federally enforceable administrative permit conditions apply to Platform B:

- A.1 **Consistency with Analysis.** Operation under this permit shall be conducted by DCOR consistent with all written data, specifications and assumptions included with the application and supplements thereof (as documented in the APCD's project file) and with the APCD's analyses under which this permit is issued as documented in the permit analyses prepared for and issued with this permit. [*Re: PTO 9111*]
- A.2 **Grounds for Revocation.** Failure to abide by and faithfully comply with this permit shall constitute grounds for the APCD to petition for permit revocation pursuant to California Health & Safety Code Section 42307 *et seq.* [*Re: PTO 9111*]
- A.3 **Equipment Maintenance.** The equipment listed in this permit shall be properly maintained and kept in good condition at all times. The equipment manufacturer's maintenance manual, maintenance procedures and/or maintenance checklists (if any) shall be kept on site.
- A.4 **Reimbursement of Costs.** All reasonable expenses, as defined in APCD Rule 210, incurred by the APCD, APCD contractors, and legal counsel for all activities that follow the issuance of this PTO permit, including but not limited to permit condition implementation, compliance verification and emergency response, directly and necessarily related to enforcement of the permit shall be reimbursed by DCOR as required by Rule 210. [*Re: PTO 9111, APCD Rule 210*]



- A.5 **Access to Records and Facilities.** As to any condition that requires for its effective enforcement the inspection of records or facilities by the APCD or its agents, DCOR shall make such records available or provide access to such facilities upon notice from the APCD. Access shall mean access consistent with California Health and Safety Code Section 41510 and Clean Air Act Section 114A. [Re: PTO 9111]
- A.6 **Compliance.** Nothing contained within this permit shall be construed by DCOR to allow the violation of any local, State or Federal rule, regulation, ambient air quality standard or air quality increment. [Re: PTO 9111]
- A.7 **Conflict between Permits.** The requirements or limits that are more protective of air quality shall apply if any conflict arises between the requirements and limits of this permit and any other permitting actions associated with the equipment permitted herein.
- A.8 **Consistency with State and Local Permits.** Nothing in this permit shall relax any air pollution control requirement imposed on the Platform B by the State of California or the California Coastal Commission in any consistency determination for the Project with the California Coastal Act. [Re: PTO 9111]
- A.9 **Compliance with Department of Interior Permits.** DCOR shall comply with all air quality control requirements imposed by the Department of the Interior in the *Plan of Development* approved for Platform B on May 6, 1968, and any subsequent modifications. Such requirements shall be enforceable by the APCD. [Re: PTO 9111]
- A.10 **Compliance with Permit Conditions.**
- (a) DCOR shall comply with all permit conditions.
  - (b) This permit does not convey property rights or exclusive privilege of any sort.
  - (c) Noncompliance with any permit conditions is grounds for permit termination, revocation and re-issuance, modification, enforcement action, or for denial of permit renewal. Any permit non-compliance constitutes a violation of the Clean Air Act and its implementing regulations or of APCD Rules or both, as applicable.
  - (d) The permittee shall not use the "need to halt or reduce a permitted activity in order to maintain compliance" as a defense for noncompliance with any permit condition.
  - (e) A pending permit action or notification of anticipated noncompliance by DCOR does not stay any permit condition.
  - (f) Within a reasonable time period, DCOR shall furnish any information requested by the Control Officer, in writing, for the purpose of determining:
    - (i) compliance with the permit, or
    - (ii) whether or not cause exists to modify, revoke and reissue, or terminate a permit or for an enforcement action.

- (g) In the event that any condition herein is determined to be in conflict with any other condition contained herein, then, if principles of law do not provide to the contrary, the condition most protective of air quality and public health and safety shall prevail to the extent feasible.

[Re: 40 CFR Part 70.6.(a)(6), APCD Rule 1303.D.1]

- A.11 **Emergency Provisions.** DCOR shall comply with the requirements of the APCD, Rule 505 (Upset/Breakdown rule) and/or APCD Rule 1303.F, whichever is applicable to the emergency situation. In order to maintain an affirmative defense under Rule 1303.F, DCOR shall provide the APCD, in writing, a “notice of emergency” within 2 working days of the emergency. The “notice of emergency” shall contain the information/documentation listed in Sections (1) through (5) of Rule 1303.F. [Re: 40 CFR 70.6(g), APCD Rule 1303.F]

A.12 **Compliance Plan.**

- (a) DCOR shall comply with all federally enforceable requirements that become applicable during the permit term, in a timely manner.
- (b) For all applicable equipment, DCOR shall implement and comply with any specific compliance plan required under any federally-enforceable rules or standards.

[Re: APCD Rule 1302.D.2]

- A.13 **Right of Entry.** The Regional Administrator of USEPA, the Control Officer, or their authorized representatives, upon the presentation of credentials, shall be permitted by DCOR to enter upon the premises where its Part 70 Source is located or where records must be kept:

- (a) To inspect the stationary source, including monitoring and control equipment, work practices, operations, and emission-related activity;
- (b) To inspect and duplicate, at reasonable times, records required by this Permit to Operate;
- (c) To sample substances or monitor emissions from the source or assess other parameters to assure compliance with the permit or applicable requirements, at reasonable times. Monitoring of emissions can include source testing.

[Re: APCD Rule 1303.D.2]

- A.14 **Severability.** In the event that any condition herein is determined to be invalid, all other conditions shall remain in force. [Re: APCD Rules 103 and 1303.D.1]

- A.15 **Permit Life.** The Part 70 permit shall become invalid three years from the date of issuance, unless a timely and complete renewal application is submitted to the APCD. Any operation of the source by DCOR to which this Part 70 permit is issued beyond the expiration date of this Part 70 permit and without a valid Part 70 operating permit (or a complete Part 70 permit renewal application) shall be a violation of the CAAA, § 502(a) and 503(d) and of the APCD rules.

DCOR shall apply for renewal of the Part 70 permit no later than 6 months before the date of the permit expiration. Upon submittal of a timely and complete renewal application, the Part 70 permit shall remain in effect until the Control Officer issues or denies the renewal application. [Re: APCD Rule 1304.D.1]

- A.16 **Payment of Fees.** DCOR shall reimburse the APCD for all its Part 70 permit processing and compliance monitoring expenses for the stationary source on a timely basis. Failure to reimburse on a timely basis shall be a violation of this permit and of applicable requirements and can result in forfeiture of the Part 70 permit. Operation without a Part 70 permit subjects the source to potential enforcement action by the APCD and the USEPA pursuant to section 502(a) of the Clean Air Act. [Re: APCD Rules 1303.D.1 and 1304.D.11, 40 CFR 70.6(a)(7)]
- A.17 **Deviations from Permit Requirements.** DCOR shall submit a written report to the APCD documenting each and every deviation from the requirements of this permit or any applicable federal requirements within 7 days after discovery of the violation, but not later than 180 days after the date of occurrence. The report shall clearly document 1) the probable cause and extent of the deviation, 2) equipment involved, 3) the quantity of excess pollutant emissions, if any, and 4) actions taken to correct the deviation. The requirements of this condition shall not apply to deviations reported to APCD in accordance with Rule 505. *Breakdown Conditions* or Rule 1303.F *Emergency Provisions*. [APCD Rule 1303.D.1, 40 CFR 70.6(a)(3)]
- A.18 **Reporting Requirements/Compliance Certifications.** DCOR shall submit compliance certification reports to the USEPA *annually* and to the Control Officer every six months. These reports shall be submitted on APCD forms and shall identify each applicable requirement/condition of the permit, the compliance status with each requirement/condition, the monitoring methods used to determine compliance, whether the compliance was continuous or intermittent, and include detailed information on the occurrence and correction of any deviations (excluding emergency upsets) from permit requirement. The reporting periods shall be each half of the calendar year, e.g., January through June for the first half of the year. These reports shall be submitted by September 1 and March 1, respectively, each year. Supporting monitoring data shall be submitted in accordance with the "Semi-Annual Monitoring/Compliance Verification Report" condition in section 9.C. DCOR shall include a written statement from the responsible official, which certifies the truth, accuracy, and completeness of the reports. [Re: APCD Rules 1303.D.1, 1302.D.3, 1303.2.c]
- A.19 **Federally-enforceable Conditions.** Each federally enforceable condition in this permit shall be enforceable by the USEPA and members of the public. None of the conditions in the APCD-only enforceable section of this permit are federally enforceable or subject to the public/USEPA review [Re: CAAA, § 502(b)(6), 40 CFR 70.6(b)].
- A.20 **Recordkeeping Requirements.** DCOR shall maintain records of required monitoring information that include the following:
- (a) The date, place and time of sampling or measurements or maintenance activity ;
  - (b) Operating conditions at the time of sampling or measurement or maintenance activity;
  - (c) Date, place, name of company or entity that performed the analyses or measurement or maintenance activity and the methods used; and

- (d) Results of the analyses or measurement or maintenance. Additionally, records must be kept that document the date of analysis and the analytical techniques or methods used.

The records (electronic or hard copy), as well as all supporting information including calibration and maintenance records, shall be maintained for a minimum of five (5) years from date of initial entry by DCOR and shall be made available to the APCD upon request. [Re: APCD Rule 1303.D.1.f, 40 CFR 70.6(a)(3)(ii)(A)]

A.21 **Conditions for Permit Reopening.** The permit shall be reopened and revised for cause under any of the following circumstances:

- (a) Additional Requirements: If additional applicable requirements (e.g., NSPS or MACT) become applicable to the source which has an unexpired permit term of three (3) or more years, the permit shall be reopened. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. However, no such reopening is required if the effective date of the requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions has been extended. All such re-openings shall be initiated only after a 30 day notice of intent to reopen the permit has been provided to DCOR, except that a shorter notice may be given in case of an emergency.
- (b) Inaccurate Permit Provisions: If the APCD or the USEPA determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit, the permit shall be reopened. Such re-openings shall be made as soon as practicable.
- (c) Applicable Requirement: If the APCD or the USEPA determines that the permit must be revised or revoked to assure compliance with any applicable requirement including a federally enforceable requirement, the permit shall be reopened. Such re-openings shall be made as soon as practicable.

Administrative procedures to reopen and revise/revoke/reissue a permit shall follow the same procedures as apply to initial permit issuance. Re-openings shall affect only those parts of the permit for which cause to reopen exists. If the permit is reopened, and revised, it will be reissued with the expiration date that was listed in the permit before the re-opening.

[Re: 40 CFR 70.7(f), 40 CFR 70.6(a)]

## **9.B. Generic Conditions**

The generic conditions listed below apply to all emission units, regardless of their category or emission rates. In case of a discrepancy between the wording of a condition and the applicable federal or APCD rule(s), the wording of the rule shall control.

- B.1 **Circumvention (Rule 301).** A person shall not build, erect, install, or use any article, machine, equipment or other contrivance, the use of which, without resulting in a reduction in the total release of air contaminants to the atmosphere, reduces or conceals an emission which would otherwise constitute a violation of Division 26 (Air Resources) of the Health and Safety Code of the State of California or of these Rules and Regulations. This Rule shall not apply to cases in which the only violation involved is of Section 41700 of the Health and Safety Code of the State of California or of APCD Rule 303 [*Re: APCD Rule 301*].
- B.2 **Visible Emissions (Rule 302).** DCOR shall not discharge into the atmosphere from any single source of emission any air contaminants for a period or periods aggregating more than three minutes in any one hour which is:
- (a) As dark or darker in shade as that designated as No. 1 on the Ringelmann Chart, as published by the United States Bureau of Mines, or
  - (b) Of such opacity as to obscure an observer's view to a degree equal to or greater than does smoke described in subsection B.2.(a) above.

For the equipment listed below, DCOR shall determine compliance with this Condition as specified below:

### 1. Offshore flaring:

For a total of four (4) planned flaring events, occurring during daylight hours, DCOR shall perform a USEPA Method 9 visible emission evaluation (VEE). For each event, the VEE duration will be for a six-minute period. DCOR staff (or contractors) certified in VEE shall perform the VEEs and maintain logs in accordance with USEPA Method 9. DCOR shall schedule one of the VEEs with the APCD so that an APCD Inspector can observe the event along with the DCOR observer. Completion of the four VEEs shall occur within 12 months of the date of final issuance of this permit.

Within 14 days after the fourth VEE is completed, DCOR shall submit all four visible emissions Method 9 logs to the APCD. If the APCD confirms that the VEEs show compliance with criteria a) or b) above, then DCOR may opt to discontinue Method 9 monitoring. If discontinued, DCOR shall submit for APCD review and approval a Flare Inspection and Maintenance Plan (Flare I&M Plan) describing the measures to ensure continued smokeless operation of the flare. The Flare I&M Plan shall be submitted within 30 days after the fourth VEE is completed. Once approved by the APCD, DCOR shall implement the Flare I&M Plan and any subsequent approved updates.

If any of the Method 9 VEEs show non-compliance with criteria a) or b) above, then DCOR (or contractors) certified in Method 9 shall continue to conduct visible emissions monitoring for planned flaring during daylight hours as specified below. The monitoring procedure below also shall be implemented if DCOR does not opt to submit a Flare I&M Plan, or if any APCD inspection detects non-compliance with criteria a) or b) above:

A visible emissions inspection for a one-minute period shall be performed once per quarter during a planned flaring event. If visible emissions are detected during the quarterly inspection, then a USEPA Method 9 visible emission evaluation (VEE) shall immediately be performed for a six-minute period or the duration of the flaring event, whichever is shorter. If a daylight-planned flaring event does not occur during a calendar quarter, then no VEE is required for that quarter.

The start-time and end-time of each VEE shall be documented, and logs shall be maintained in accordance with Method 9. The logs shall be included in the semi-annual Compliance Verification Reports. [Re: APCD Rule 302].

#### 2. Diesel Fueled IC Engines:

Once per calendar quarter, DCOR shall perform a visible emissions inspection for a one-minute period on each engine when operating. If an engine does not operate during a calendar quarter, no monitoring is required. If visible emissions are detected during any inspection then an USEPA Method 9 visible emission evaluations (VEE) shall immediately be performed for a six-minute period. DCOR staff or hired contractor certified in VEE shall perform the VEE and maintain logs in accordance with USEPA Method 9. The start-time and end-time of each visible emissions inspection shall be recorded in a log, along with a notation identifying whether visible emissions were detected. [Re: APCD Rule 302]

#### 3. Offshore Platform Crane:

During biennial source testing of the north crane, DCOR shall perform a visible emissions inspection on the crane for a one-minute period. If visible emissions are detected during any inspection, then a USEPA Method 9 visible emission evaluation (VEE) shall immediately be performed for a six-minute period. DCOR staff or hired contractor certified in VEE shall perform the VEE and maintain logs in accordance with USEPA Method 9. The start-time and end-time of each visible emissions inspection shall be recorded in a log, along with a notation identifying whether visible emissions were detected. [Ref: APCD Rule 302].

- B.3 **PM Concentration - South Zone (Rule 305).** DCOR shall not discharge into the atmosphere, from any source, particulate matter in excess of the concentrations listed in Table 305(a) of Rule 305 [Re: APCD Rule 305].
- B.4 **Specific Contaminants (Rule 309).** DCOR shall not discharge into the atmosphere from any single emission source sulfur compounds, carbon monoxide and combustion contaminants in excess of the applicable standards listed in Sections A, E and G of Rule 309 [Re: APCD Rule 309].

- B.5 **Sulfur Content of Fuels (Rule 311).** The permittee shall not burn fuels with sulfur content in excess of 0.5% (by weight) for liquid fuels. Compliance with this condition shall be based on each diesel fuel supplier's statement or billing records showing the certified sulfur content for each shipment. DCOR shall submit such statement *semi-annually* as a part of its semi-annual Part 70 compliance verification report to the APCD [Re: APCD Rule 311].
- B.6 **Organic Solvents (Rule 317).** DCOR shall comply with the emission standards listed in Section B of Rule 317. Compliance with this condition shall be based on DCOR's compliance with Condition C.7 of this permit. [Re: APCD Rule 317]
- B.7 **Metal Surface Coating Thinner and Reducer (Rule 322).** The use of photochemically reactive solvents as thinners or reducers in metal surface coatings is prohibited. Compliance with this condition shall be based on DCOR's compliance with Condition C.7 of this permit and facility inspections. [Re: APCD Rule 322]
- B.8 **Architectural Coatings (Rule 323).** DCOR shall comply with the coating ROC content and handling standards listed in Section D of Rule 323 as well as the Administrative requirements listed in Section F of Rule 323. Compliance with this condition shall be based on DCOR's compliance with Condition C.7 of this permit and facility inspections. [Re: APCD Rules 323, 317, 322, 324]
- B.9 **Disposal and Evaporation of Solvents (Rule 324).** DCOR shall not dispose through atmospheric evaporation of more than one and a half gallons of any photochemically reactive solvent per day. Compliance with this condition shall be based on DCOR's compliance with Condition C.7 of this permit and facility inspections[Re: APCD Rule 324].
- B.10 **Adhesives and Sealants (Rule 353).** The permittee shall not use adhesives, adhesive bonding primers, adhesive primers, sealants, sealant primers, or any other primers, unless the permittee complies with the following:
- (a) Such materials used are purchased or supplied by the manufacturer or suppliers in containers of 16 fluid ounces or less; or alternately
  - (b) When the permittee uses such materials from containers larger than 16 fluid ounces and the materials are not exempt by Rule 353, Section B.1, the total reactive organic compound emissions from the use of such material shall not exceed 200 pounds per year unless the substances used and the operational methods comply with Sections D, E, F, G, and H of Rule 353. Compliance shall be demonstrated by record keeping in accordance with Section B.2 and/or Section O of Rule 353.
- B.11 **Emissions of Oxides of Nitrogen from Large Water Heaters and Small Boilers (Rule 360).** The permittee shall comply with the requirements of this rule whenever a new boiler, process heater or other external combustion device is added or an existing unit is replaced. An ATC/PTO permit shall be obtained prior to installation of any grouping of Rule 360 applicable boilers or hot water heaters whose combined system design heat input rating exceeds 2.000 MMBtu/hr. An ATC shall be obtained for any size boiler or water heater if the unit is not fired on natural gas or propane. [Re: APCD Rule 360].

- B.12 **Breakdowns (Rule 505).** DCOR shall promptly report breakdowns that result in violations of emission limitations or restrictions prescribed by APCD Rules or by this permit; such reporting shall be made in conformance with the requirements of Rule 505, Sections A, B1, and D.
- B.13 **Oil & Natural Gas Production MACT:** DCOR shall comply with all applicable recordkeeping requirements listed in Appendix A of this MACT to demonstrate its exemption under the 'black oil' provision of the MACT. [*Re: 40 CFR 63, Subpart HH*]
- B.14 **CARB Registered Portable Equipment.** State registered portable equipment (e.g., IC engines) shall comply with State registration requirements. A copy of the State registration shall be readily available whenever the equipment is at the facility. [*Re: APCD Rule 202*]
- B.15 **Emergency Episode Plan (Rule 603).** During emergency episodes, DCOR shall implement the Emergency Episode Plan as approved by the APCD in April 1997 {*Re: APCD Rule 603*}.



## 9.C Equipment Specific Conditions

This section includes non-generic federally-enforceable conditions, including conditions for emissions and operations limits, monitoring, record-keeping and reporting for each specific equipment group.

- C.1 **Internal Combustion Engines.** The following equipment items are included in this emissions unit category:

APCD Device No.	Name
004886	South Crane (109 bhp, DD 3-71)
004887	North Crane (230 bhp, DD 6-71)
102098	'Onan' Power Generator (21.8 bhp, Onan P2297)
110757	Portable Air Compressor (49 hp)

*Italics indicate that the equipment items are APCD-permit exempt; however federally enforceable conditions listed in Section 9.B shall apply to these units, wherever applicable.*

- (a) **Emission Limits:** Mass emissions from the North and South Crane IC engines listed above shall not exceed the limits listed in Tables 5.1-3 and 5.1-4. In addition, the following specific emission limits apply:

*North Crane Engine* - Controlled emissions of NO<sub>x</sub> from the North Crane engine shall not exceed the applicable Rule 333 concentration limit. Beginning November 21, 2010, the NO<sub>x</sub>, ROC and CO concentration in the exhaust from the north crane engine shall not exceed the applicable revised Rule 333 concentration limits. Compliance shall be based on quarterly portable analyzer inspections and in accordance with Rule 333.

- (b) **Operational Limits:** The following operational limits apply to the South Crane and North Crane IC engines:

- (i) **Fuel and Fuel Additive Requirements** - The permittee may only add CARB Diesel, or an alternative diesel fuel that meets the requirements of the Stationary Diesel ATCM Verification Procedure, or CARB Diesel fuel used with additives that meet the requirements of the Stationary Diesel ATCM Verification Procedure, or any combination of the above to each IC engine or any fuel tank directly attached to each IC engine. Diesel fuel used by all IC engines shall have a sulfur content no greater than 0.0015 weight percent.
- (ii) **Operating Limits** - DCOR shall comply with the following operating limits:
- The North crane engine shall use no more than: 309 gallons per day; 6,443 gallons per quarter; 12,886 gallons per year of diesel fuel.
  - The South crane engine shall operate no more than 24 hours per day; 100 hours per quarter; 200 hours per year, which is equivalent to 155 gallons per day; 649 gallons per quarter; 1,298 gallons per year of diesel fuel use.

- (iii) *Engine Identification and Maintenance* - Each IC engine shall be identified with a permanently-affixed plate, tag or marking, referencing either: (i) the IC engine's make, model, serial number, rated BHP and corresponding RPM; or (ii) the operator's unique tag number. The tag shall be made accessible and legible to facilitate APCD inspection of the IC engine.
- (c) Monitoring: The following source testing and periodic monitoring conditions apply to the North and South Crane IC engines:
  - (i) *Non-Resettable Hour Meter* – Each engine shall have installed a non-resettable hour meter with a minimum display capability of 9,999 hours, unless the APCD has determined (in writing) that a non-resettable hour meter with a different minimum display capability is appropriate in consideration of the historical use of the engine and the owner or operator's compliance history. A monthly log shall be maintained that records the hours of operation of each engine.
  - (ii) *Inspection and Maintenance Plan (I&M Plan)* - DCOR shall implement quarterly inspections on the North Crane engine according to the APCD-approved Engine Inspection and Maintenance Plan consistent with the requirements of Rule 333, Section F. This Plan, and any subsequent APCD-approved revisions, is incorporated by reference as an enforceable part of this permit.
  - (iii) *Source Testing* - For the North Crane engine, DCOR shall perform source testing of air emissions and process parameters listed in Table 4.1 (Source Test Requirements) in accordance with the requirements of Rule 333, Section I. The Source Testing permit condition in this permit shall be adhered to.
  - (iv) *Fuel Data* - DCOR shall maintain documentation of the diesel fuel sulfur content for each fuel shipment as certified in the fuel suppliers billing vouchers.
- (d) Recordkeeping: DCOR shall keep the required records/logs, as applicable to this permit, which demonstrate compliance with emission limits, operation limits and monitoring requirements above. All records/logs shall be available to the APCD upon request. Written information (logs) shall include:
  - (i) The hours of operation for the North and South crane engines (by ID number). The log shall detail the number of operating hours on each day the engine is operated and the cumulative total quarterly and annual hours.
  - (ii) The sulfur content of each fuel shipment as documented by fuel supplier records (e.g. billing vouchers or bills of lading). On an annual basis, the heating value of the diesel fuel (Btu/gal) shall be recorded based on measurement by DCOR or certified by the fuel supplier.

- (iii) Fuel purchase records or a written statement on the fuel supplier's letterhead signed by an authorized representative of the company confirming that the fuel purchased is either CARB Diesel, or an alternative diesel fuel that meets the requirements of the Verification Procedure, or an alternative fuel, or CARB Diesel fuel used with additives that meet the requirements of the Verification Procedure, or any combination of the above (Reference Stationary Diesel ATCM and Title 13, CCR, Sections 2281 and 2282).
  - (iv) IC engine operations logs, including quarterly inspection results, consistent with the requirements of Rule 333.J.
  - (v) If an operator's tag number is used in lieu of an IC engine identification plate, documentation which references the operator's unique IC engine ID number to a list containing the make, model, serial number, rated maximum BHP and the corresponding RPM.
- (e) Reporting: On a semi-annual basis, a report detailing the previous six month's activities shall be provided to the APCD. The report must list all data required by the *Semi-Annual Compliance Verification Reports* condition of this permit.  
(Re: APCD Rules 202, 333 and 1303, PTO 9111, 40 CFR 70.6)

C.2 **Combustion Equipment - Flare.** The following equipment items are included in this emissions unit category:

APCD Device No.	Name
005506	Flare Relief System; 2,500 MMBtu/hr

- (a) Emission Limits: Mass emissions from the flare relief system listed above shall not exceed the limits listed in Tables 5.1-3 and 5.1-4.
- (b) Operational Limits:
  - (i) *Flaring Volumes* - Flaring volumes from the purge and pilot, planned continuous, planned intermittent (other) and unplanned events shall not exceed the volumes in Table 5.1-1.
  - (ii) *Flare Fuel Gas Sulfur Limit* - The sulfur content of produced gas combusted during planned flaring events shall not exceed 15 gr/100 scf (239 ppmv) total sulfur calculated as hydrogen sulfide at standard conditions. Planned flaring is defined in APCD Rule 359. Compliance shall be based on annual lab analyses. DCOR shall perform additional testing of the sulfur content, using approved test methods, as requested by the APCD. DCOR shall submit the lab analyses reports to the APCD.

- (iii) *Use of Propane as Flare Fuel Gas* - Propane may be used as an auxiliary fuel to the flare purge and pilot fuel gas on a temporary basis only during times when the supply of produced gas becomes disabled. The propane shall meet Gas Processors Association specifications for propane or HD-5 and shall have total sulfur content no greater than 15 gr/100 scf (239 ppmv). DCOR shall record in a log each usage of propane in an APCD-approved format and shall maintain documentation of the sulfur content of each fuel shipment as certified in the fuel suppliers billing vouchers.
- (c) Monitoring: The following monitoring conditions apply to the flare relief system:
- (i) *Flare Volumes* - The volumes of gas flared shall be monitored by use of the APCD-approved flare header flow meter. The meter shall be operated consistent with DCOR's *Process Monitor Calibration and Maintenance Plan*.
  - (ii) *Sulfur Content* – For each flare event *lasting more than one hour*, the H<sub>2</sub>S concentration of the flared gas shall be measured by detection tube. In addition, the total sulfur content of produced gas combusted during planned flaring events shall be measured on an annual basis using APCD-approved ASTM methods. DCOR shall perform additional testing of the sulfur content, using approved test methods, as requested by the APCD. DCOR shall submit all such lab analyses reports to the APCD.
- (d) Recordkeeping: The following recordkeeping conditions apply to the flare relief system:
- (i) *Flare Volumes* - All flaring events shall be recorded in a log. The log shall include: date; duration of flaring events (start and stop times); quantity of gas flared; reason for flaring events; and the type of event (e.g., planned or unplanned).
  - (ii) *Sulfur Content* - A log of the total sulfur content of produced gas combusted during flaring events shall be maintained.
  - (iii) *Propane as Flare Fuel Gas* - DCOR shall record in a log each usage of propane in an APCD-approved format and shall maintain documentation of the sulfur content of each fuel shipment as certified in the fuel suppliers billing vouchers.
- (e) Reporting: On a semi-annual basis, a report detailing the previous six month's activities shall be provided to the APCD. The report must list all data required by the *Semi-Annual Compliance Verification Reports* condition of this permit.  
(Re: APCD Rules 359 and 1303, PTO 9111, 40 CFR 70.6)

C.3 **Fugitive Hydrocarbon Emissions Components.** The following equipment items are included in this emissions unit category:

APCD Device No.	Name
	<i>Gas/Light Liquid Service Components</i>
102165	Valves/Connections/Other – Controlled (8,028 comp-leak-paths)
102166	Valves/Connections/Other – Unsafe (73 comp-leak-paths)
	<i>Oil Service Components</i>
102167	Valves/Connections/Other – Controlled (7,127 comp-leak-paths)
102168	Valves/Connections/Other – Unsafe (40 comp-leak-paths)

- (a) Emission Limits: Mass emissions from the gas/light liquid service and oil service components listed above shall not exceed the limits listed in Tables 5.1-3 and 5.1-4.
- (b) Operational Limits: Operation of the equipment, *including the ½-inch or less diameter stainless steel fittings*, listed in this section shall conform to the requirements listed in APCD Rule 331.D and E. Compliance with these limits shall be assessed through compliance with the monitoring, recordkeeping and reporting conditions in this permit. In addition DCOR shall meet the following requirements:
  - (i) *VRS Use* - The vapor recovery/gas collection (VRGC) system shall be in operation when the equipment connected to the VRGC system at the facility is in use. The VRGC system includes piping, valves, and flanges associated with the VRGC system. The VRGC system shall be maintained and operated to minimize the release of emissions from all systems, including pressure relief valves and gauge hatches.
  - (ii) *I&M Program* - The APCD-approved I&M Plan for Platform B (*last updated in August 2002*) shall be implemented for the life of the project. The Plan, and any subsequent APCD approved revisions, is incorporated by reference as an enforceable part of this permit.
  - (iii) *Leak-Path Count* - The total leak-path component count listed in DCOR's most recent I&M component leak-path inventory shall not exceed the total leak-path component count listed in Table 5.1-1 by more than five percent. This five percent range is to allow for minor differences due to component counting methods and does not constitute allowable emissions growth due to the addition of new equipment.
  - (iv) *Venting* - All routine venting of hydrocarbons shall be routed to either the sales compressor, flare header, injection well or other APCD-approved control device.

- (v) *BACT* – BACT, as defined in Table 4.1, shall be implemented for the life of the project. The following BACT components have been installed:

Date Approved	Rule 331 ID Number	Component Type	Location/ Description	BACT Replacement	LDAR
4/15/98 or 8/14/97	CBA-235	Compressor Seal	300 hp rotary sliding-vane gas compressor	Double Bellows-type Mechanical Sealing System	
3/22/99	95934	Compressor Shaft	Sales Compressor	Dry Running Tandem Seal connected to Vapor Recovery	100 ppm
3/2/99	95687	RAM	Well B-37	Welded. The RAM was removed from service.	100 ppm

- (c) Monitoring: The equipment items listed in this section are subject to all the monitoring requirements listed in APCD Rule 331.F. The test methods in Rule 331.H shall be used, when applicable.
- (d) Recordkeeping: All inspection and repair records shall be retained at the source for a minimum of five years. The equipment items listed in this section are subject to all the recordkeeping requirements listed in APCD Rule 331.G. In addition, DCOR shall:

*I&M Log* - DCOR shall record in a log the following: a record of leaking components *including all 1/2-inch or less diameter stainless steel fittings* found (including name, location, type of component, date of leak detection, the ppmv reading, date of repair attempt, method of detection, date of re-inspection and ppmv reading after leak is repaired); a record of the total components inspected and the total number and percentage found leaking by component type; a record of leaks from critical components; a record of leaks from components that incur five repair actions within a continuous 12-month period; and, a record of component repair actions including dates of component re-inspections.

- (e) Reporting: The equipment items listed in this section are subject to all the reporting requirements listed in APCD Rule 331.G. On a semi-annual basis, a report detailing the previous six month's activities shall be provided to the APCD. The report must list all data required by the *Semi-Annual Compliance Verification Reports* condition of this permit. [Re: APCD Rules 331 and 1303, PTO 9111, 40 CFR 70.6]

C.4 **Crew and Supply Boats.** The following equipment are included in this emissions category:

APCD Device No.	Name
005511	Crew Boat Main Engines – Controlled
110623	Crew Boat Main Engines – Uncontrolled
005512	Crew Boat Auxiliary Engines
005507	Supply Boat Main Engines – Controlled
110624	Supply Boat Main Engines – Uncontrolled
005508	Supply Boat Auxiliary Engines
005509	Supply Boat Bow Thrusters
005510	Emergency Response Boat

- (a) Emission Limits: Mass emissions from the crew, supply, and emergency boats listed above shall not exceed the limits listed in Tables 5.1-3 and 5.1-4. In addition:
- (i) *NO<sub>x</sub> Emissions* - Controlled emissions of NO<sub>x</sub> from each diesel fired main engine in each controlled supply boat shall not exceed 270 lb./1000 gallons (5.99 g/bhp-hr). Emissions of NO<sub>x</sub> from each diesel fired main engine in each controlled crew boat shall not exceed 337 lb./1000 gallons (8.4 g/bhp-hr). Compliance shall be based on annual source testing consistent with the requirements listed in Table 4.1 and permit Condition 25 of PTO 9111 (issued September 4, 1994). Spot charter crew boats, spot charter supply boats and emergency response (e.g., *Clean Seas*) boats are not required to comply with this controlled NO<sub>x</sub> emission rate.
  - (ii) *Crew, Supply and Emergency Response Boat Stationary Source Maximum Permitted Emissions* - To more accurately define the *Dos Cuadras - South County* Stationary Source's annual potential-to-emit (which is used to determine fees for Air Quality Plans (Rule 210.F)), crew boat, supply boat (including spot charters) and emergency response boat usage, in aggregate, associated with OCS Platforms A, B, C, Henry and Hillhouse shall not exceed five (5) times the annual emission limits shown in Table 5.2. These limits apply to the crew boats, supply boats and emergency response boats separately.
- (b) Operational Limits: Operation of the equipment listed in this section shall not exceed the limits listed below. Compliance with these limits shall be assessed through compliance with the monitoring, recordkeeping and reporting conditions in this permit.
- (i) The supply boat main engines shall not use more than: 1,400 gallons per day; 7,278 gallons per quarter; 14,556 gallons per year of diesel fuel.
  - (ii) The supply boat auxiliary engines (generator and bow thruster engines) shall not use more than: 205 gallons per day; 1,066 gallons per quarter; 2,131 gallons per year of diesel fuel.

- (iii) The emergency response boat engines shall not use more than: 12,500 gallons per quarter; 50,000 gallons per year of diesel fuel. DCOR's pro-rated allocation of allowable emergency response boat fuel usage shall not exceed: 1,137 gallons per quarter; 4,546 gallons per year of diesel fuel.
- (iv) The crew boat main engines shall not use more than: 1,252 gallons per day; 18,776 gallons per quarter; 75,104 gallons per year of diesel fuel.
- (v) The crew boat auxiliary engines shall not use more than: 105 gallons per day; 1,574 gallons per quarter; 6,295 gallons per year of diesel fuel.
- (vi) *Crew, Supply and Emergency Response Boat Stationary Source Operational Limits* - To more accurately define the *Dos Cuadras - South County* Stationary Source's annual potential-to-emit (which is used to determine fees for Air Quality Plans (Rule 210.F)), crew boat, supply boat (including spot charters) and emergency response boat usage, in aggregate, associated with OCS Platforms A, B, C, Henry and Hillhouse shall not exceed five times the annual fuel use limits shown in items (i), (ii), (iii) and (iv) above. These limits apply to the crew boat main engines, crew boat auxiliary engines, supply boat main engines, supply boat auxiliary engines and emergency response boat engines separately.
- (vii) *Spot Charter Boats* - The number of allowable annual spot charter crew boat trips shall not exceed ten percent of the actual annual number of trips made by the controlled (i.e., primary) crew boat. The number of allowable annual spot charter supply boat trips shall not exceed ten percent of the actual annual number of trips made by the controlled (i.e., primary) supply boats. A trip is defined as any time the boat makes a trip from the port to the platform and back (i.e.. a round trip).
- (viii) *New/Replacement Boats* – DCOR may utilize any new/replacement project boat without the need for a permit revision if that boat meets the following conditions:
  - (a) The main engines are of the same or less bhp rating; and
  - (b) The combined pounds per day potential to emit (PTE) of all auxiliary and bow thruster engines is the same or less than the sum of the pounds per day PTE for these engines as determined from the corresponding Table 5.1-3 emission line items of this permit.
  - (c) The NO<sub>x</sub>, ROC, CO, PM and PM<sub>10</sub> emission factors are the same or less for the main and auxiliary engines.

The above criteria also apply to spot charter boats, except for the NO<sub>x</sub> emission standard noted in (c) above. Any proposed new/replacement crew, supply or spot charter boat that does not meet the above requirements (a) - (c) shall first obtain a permit revision prior to operating the boat. The APCD may require manufacturer guarantees and emission source tests to verify this NO<sub>x</sub> emission standard.



DCOR shall revise the Boat Monitoring and Reporting Plan, obtain APCD approval of such revisions and implement the revised Plan prior to bringing any new/replacement boat into service, except for the use of spot charters. If a new spot charter is brought into service then DCOR shall revise and resubmit the boat plan within thirty (30) calendar days after it is first brought into service. If the fuel metering and emissions computation procedures for a new spot charter are identical to a boat that is already addressed in the approved boat plan, a letter addendum stating this will suffice for the revision/re-submittal of the boat plan.

Prior to bringing the boat into service for the first time, DCOR shall submit the information listed below to the APCD for any new/replacement crew and supply boat that meets the requirements set forth in (a) - (c) above, and for new spot charters that have been not been previously used on the DCOR OCS Platforms project. For spot charters, this information shall be submitted within thirty (30) calendar days after the boat is first brought into service. DCOR shall notify the APCD (via fax or E-mail) within three (3) calendar days after a new spot charter is first brought into operation. Any boat put into service that does not meet the requirements above, as determined by the APCD at any time, shall immediately cease operations and all prior use of that boat shall be considered a violation of this permit.

- Boat description, including the type, size, name, engine descriptions and emission control equipment.
  - Engine manufacturers' data on the emission levels for the various engines and applicable engine specification curves.
  - A quantitative analysis using the operating and emission factor assumptions given in tables 5.1-1 and 5.1-2 of this permit that demonstrates criteria (b) above is met.
  - Estimated fuel usage within 25-miles of Platform B.
  - Any other information the APCD deems necessary to ensure the new boat will operate consistent with the analyses that form the basis for this permit.
- (ix) *Fuel and Fuel Additive Requirements* - The permittee may only add CARB Diesel, or an alternative diesel fuel that meets the requirements of the ATCM Verification Procedure, or CARB Diesel fuel used with additives that meet the requirements of the ATCM Verification Procedure, or any combination of the above to each engine or any fuel tank directly attached to each engine.
- (x) *Crew and Supply Boat Use* - Crew, supply and spot charter boats shall be used for the activities specified below. Any boats used for or in support of activities not specified below will be considered as new projects, and the boat emissions associated with such projects will be considered in the project potential to emit.

(a) *Crew boats:* Crew boats shall be used for the following activities:

1. Load, transport (receipt, movement and delivery) and unload personnel, supplies, and equipment to and from the platforms and dock or pier locations for routine operations and special logistic situations, [Examples: transport of drilling/work-over fluid, casing, specialty chemicals, cement or other supplies].
2. Support supply/work boat while it is working at the platforms, [Examples: hold supply boat in position and transfer equipment or supplies].
3. Operate boat engines to maintain boat positioning while working at the platforms, docks, or piers or in open waters.
4. Support operations in conjunction with maintenance and/or repairs on platform components, [Examples: mooring buoy, boat dock, structural supports, diving operations and cathodic protection equipment].
5. Support operations in conjunction with surveys of platform and sub-sea components including pipelines and power cables, [Examples: side scan sonar, ROV inspection, diving inspections and marine biological inspections].
6. Support operations in conjunction with small-scale drilling and work-over operations, [Examples: perforation watch and marine safety zone surveillance].
7. Support/participate in oil spill drills and actual incidents, [Examples: deploying boom and recovery equipment, taking samples and personnel exposure measurements and other spill response activities].
8. Support/participate in safety, health, and emergency drills and actual incidents. [Examples: third party requests for assistance, Medi-vac and platform evacuation as well as other safety and health activities, fire and explosion, well control blowout, storm, vessel collision, bomb threat, support operations during periods of elevated Homeland Security Alert threat levels (orange or red) as requested by Federal Agencies, and man overboard].
9. Provide standby boat services when required due to limitations of platform survival craft capabilities and/or platform personnel count.
10. Supply marine support services to accommodate activities by local, state and federal agencies and special industry / public interest groups when requested.

11. Conduct engine source compliance tests as required by the permits or other rules and regulations.
  12. Perform vessel and boat maintenance as required.
  13. Travel to safe harbor from platforms, dock or pier during extreme weather or other emergency situations.
- (b) *Supply Boats*: Supply/Work boats (hereinafter referred to as “supply boats”) shall be used for the following activities:
1. Load, transport (receipt, movement and delivery) and unload personnel, equipment and supplies to and from the platforms and Port Hueneme or other ports during routine operations to accommodate special logistic situations, [Examples: transport of drilling/work-over fluid, casing, specialty chemicals, cement or other supplies to a dock or pier to accommodate special needs of a vendor].
  2. Support supply/work boat while it is working at the platforms, [Examples: hold supply boat in position and transfer equipment or supplies].
  3. Operate boat engines to maintain boat positioning while working at the platforms, docks, or piers or in open waters.
  4. Support operations in conjunction with maintenance and/or repairs on platform components, [Examples: mooring buoy, boat dock, structural supports, diving operations and cathodic protection equipment].
  5. Support operations in conjunction with surveys of platform and sub-sea components including pipelines and power cables, [Examples: side scan sonar, ROV inspection, diving inspections and marine biological inspections].
  6. Support operations in conjunction with small-scale drilling and work-over operations. Specially equipped drilling vessels do not qualify as supply boats [Examples: perforation watch and marine safety zone surveillance].
  7. Support/participate in oil spill drills and actual incidents. [Examples: deploying boom and recovery equipment, taking samples and personnel exposure measurements and other spill response activities].

8. Support/participate in safety, health, and emergency drills and actual incidents, [Examples: third party requests for assistance, Medi-vac and platform evacuation as well as other safety and health activities,-fire and explosion, well control blowout, storm, vessel collision, bomb threat, support operations during periods of elevated Homeland Security Alert threat levels (orange or red) as requested by Federal Agencies, and man overboard].
9. Provide standby boat services when required due to limitations of platform survival craft capabilities and/or platform personnel count.
10. Supply marine support services to accommodate activities by local, state and federal agencies and special industry/public interest groups when requested.
11. Conduct engine source compliance tests as required by the permits or other rules and regulations.
12. Perform vessel and boat maintenance as required.

- (c) Monitoring: DCOR shall comply with the latest *Boat Monitoring and Reporting Plan* (approved 4/11/06 and any APCD-approved updates thereof). This revised Plan reflects the engines associated with the *M/V Santa Cruz*. DCOR shall fully implement this Plan or its APCD-approved updates, for the life of the project. The Plan is hereby incorporated by reference as part of this permit.

The data collected from the boat plan shall demonstrate that the boats are being operated consistent with the emission assumptions used in the issuance of this operating permit. Fuel use for all the main engines must be collected while the boats are in transit during project related trips. Spot charter boats shall, at a minimum, track total fuel usage on a per trip basis using APCD-approved procedures. Emergency response boats shall, at a minimum, track fuel usage on a quarterly basis using APCD-approved procedures. These data shall be submitted in an APCD-approved format to the APCD.

- (d) Recordkeeping: The following records shall be maintained and shall be made available to the APCD upon request:
- (i) *Maintenance Logs* - Maintenance log summaries that include details on injector timing, setting adjustments, major engine overhauls, and routine engine maintenance. These logs and summaries shall be made available to the APCD upon request. For each main and auxiliary engine with timing retard, an APCD Form – 10 (IC Engine Timing Certification Form) must be completed each time the engine is serviced.
  - (ii) *Crew Boat Fuel Usage* - Daily, quarterly and annual fuel use for the crew boat main engines and auxiliary engines, itemized by controlled and uncontrolled boats.
  - (iii) *Supply Boat Fuel Usage* - Daily, quarterly and annual fuel use for the supply boat main engines, generator engine and bow thruster engine.

- (iv) *Emergency Response Boat Fuel Usage* - Total quarterly and annual fuel use for the emergency response boat and Platform B's allocation of that total.
- (v) The sulfur content of each fuel shipment delivered to the boats as documented by fuel supplier records (e.g., billing vouchers, or bills of lading).
- (vi) In addition to the recordkeeping requirements of DCOR's approved *Boat Monitoring and Reporting Plan*, the following log shall be maintained and shall be provided to the APCD in the semi-annual Compliance Verification Reports:
  - The number of boat trips made by the primary crew and supply boats, itemized by the date of the trip and the boat name.
  - The number of boat trips made by the spot-charter crew and supply boats, itemized by the date of the trip and the boat name.
- (vii) *Emissions Reporting* – Quarterly emissions from the crew, supply and emergency boats shall be reported based on the computed fuel use.
- (e) Reporting: On a semi-annual basis, a report detailing the previous six month's activities shall be provided to the APCD. The report must list all data required by the *Semi-Annual Compliance Verification Reports* condition of this permit  
 [Re: APCD Rule 1303, PTO 9111, ATC/PTO 10089, 40 CFR 70.6]

C.5 **Pigging Equipment.** The following equipment items are included in this emissions category:

APCD Device No.	Name
102148	Gas Pig Launcher
102149	Gas Pig Receiver
102147	Oil Pig Launcher
102150	Oil Pig Receiver

- (a) Emission Limits: Mass emissions from the gas and oil pig launchers and receivers listed above shall not exceed the limits listed in Tables 5.1-3 and 5.1-4.
- (b) Operational Limits: Operation of the equipment listed in this section shall conform to the requirements listed in APCD Rule 325.E. Compliance with these limits shall be assessed through compliance with the monitoring, recordkeeping and reporting conditions in this permit. In addition DCOR shall meet the following requirements:
  - (i) *Events* - The number of oil and gas pig operations (events) shall not exceed the maximum operating schedule listed in Table 5.1-1. This will be verified by data from the pigging operations log kept by DCOR.

- (ii) *Pressure* - Prior to opening each gas or oil pig, the pressure in the pig shall not exceed 1 psig. For gas pigging, this limit will be verified by a pressure gauge recorder at the VRU compressor inlet or by any other contrivance that provides the same accuracy and has been approved by the APCD prior to its installation.
- (iii) *ROC/TOC Ratio* - DCOR shall first purge and blanket all pig receivers/launchers with 'sales gas' produced by DCOR before opening the hatches. The ROC/TOC ratio, by weight, for this gas shall not exceed 0.1527 as measured *semi-annually* by DCOR.
- (iv) *Openings* - Access openings to the pig launchers/receivers shall be kept closed at all times, except when a pipeline pig is being placed into or removed from the launcher/receiver.
- (c) Monitoring: See conditions (b) (i) through (b) (iii) above, particularly the *semi-annual* ROC/TOC ratio determination required under (b)(iii).
- (d) Recordkeeping: DCOR shall record in a log each pigging operation. The log shall include the date pigging unit used (e.g., gas unit) and the de-pressurized chamber pressure data via the VRU compressor inlet pressure recorder, immediately prior to pig chamber opening.
- (e) Reporting: On a semi-annual basis, a report detailing the previous six month's activities shall be provided to the APCD. The report must list all data required by the *Semi-Annual Compliance Verification Reports* condition of this permit  
[Re: APCD Rules 325 and 1303, PTO 9111, 40 CFR 70.6]

C.6 **Sumps/Tanks/Separators.** The following equipment are included in this emissions category:

APCD Device No.	Name
005513	Waste Oil Sump
005514	Flotation Cell Unit
005515	Skimmer Tank
005516	Wastewater Tank

- (a) Emission Limits: Mass emissions from the equipment listed above shall not exceed the limits listed in Tables 5.1-3 and 5.1-4.
- (b) Operational Limits: All process operations from the equipment listed in this section shall meet the requirements of APCD Rule 325, Sections D, E, F and G. Compliance with these limits shall be assessed through compliance with the monitoring, recordkeeping and reporting conditions in this permit.
  - (i) *VRS Use* - The vapor recovery system shall be in operation when the equipment connected to the VRS system at the facility is in use. The VRS system includes piping, valves, and flanges associated with the VRS system. The VRS system shall be maintained and operated to minimize the release of emissions from all systems, including pressure relief valves and gauge hatches.

- (ii) *Vapor Recovery System Efficiency* - The VRS shall maintain a minimum efficiency of 90 percent (mass basis).
- (iii) *Oil/Water Separator* - The floatation cell unit shall not process more than 1.44 million gallons per day and 525.60 million gallons per year.
- (c) **Monitoring:** The equipment listed in this section is subject to all the monitoring requirements of APCD Rule 325.H. The test methods outlined in APCD Rule 325.G shall be used, when applicable. In addition, DCOR shall:
  - (i) Analyze the process streams listed in the *Process Stream Sampling and Analysis* permit condition (9.C.14.).
- (d) **Recordkeeping:** The equipment listed in this section is subject to all the recordkeeping requirements listed in APCD Rule 325.F. In addition, DCOR shall maintain logs for the information listed below. These logs shall be made available to the APCD upon request:
  - (i) On a monthly basis, the total oil emulsion and produced gas production along with the number of days per month of production
  - (ii) Process stream analyses data as required from the Process Stream Sampling and Analysis permit condition.
  - (iii) On a daily basis, the amount of oily water processed in each floatation cell unit in units of gallons.
- (e) **Reporting:** On a semi-annual basis, a report detailing the previous six month's activities shall be provided to the APCD. The report must list all data required by the *Semi-Annual Compliance Verification Reports* condition of this permit.  
 [Re: APCD Rules 325 and 1303, PTO 9111, 40 CFR 70.6]

C.7 **Solvent Usage.** The following equipment items are included in this emissions unit category:

APCD Device No.	Name
110882	Cleaning/Degreasing

- (a) **Emission Limits:** Mass emissions from the solvent usage shall not exceed the limits listed in Tables 5.1-3 and 5.1-4.
- (b) **Operational Limits:** Use of solvents for cleaning/degreasing shall conform to the requirements of APCD Rules 317, 322, 323 and 324. Compliance with these rules shall be assessed through compliance with the monitoring, recordkeeping and reporting conditions in this permit and facility inspections.

- (i) *Containers* - Vessels or containers used for storing materials containing organic solvents shall be kept closed unless adding to or removing material from the vessel or container.
  - (ii) *Materials* - All materials that have been soaked with cleanup solvents shall be stored, when not in use, in closed containers that are equipped with tight seals.
  - (iii) *Solvent Leaks* - Solvent leaks shall be minimized to the maximum extent feasible or the solvent shall be removed to a sealed container and the equipment taken out of service until repaired. A solvent leak is defined as either the flow of three liquid drops per minute or a discernable continuous flow of solvent.
  - (iv) *Reclamation Plan* - DCOR may submit a Plan to the APCD for the disposal of any reclaimed solvent. If the Plan is approved by the APCD, all solvent disposed of pursuant to the Plan will not be assumed to have evaporated as emissions into the air and, therefore, will not be counted as emissions from the source. DCOR shall obtain APCD approval of the procedures used for such a disposal Plan. The Plan shall detail all procedures used for collecting, storing and transporting the reclaimed solvent. Further, the ultimate fate of these reclaimed solvents must be stated in the Plan.
- (c) Monitoring: None.
- (d) Recordkeeping: DCOR shall record in a log the following on a monthly basis for each solvent used: amount used; the percentage of ROC by weight (as applied); the solvent density; the amount of solvent reclaimed for APCD-approved disposal; whether the solvent is photochemically reactive; and, the resulting emissions to the atmosphere in units of pounds per month and pounds per day. Product sheets (MSDS or equivalent) detailing the constituents of all solvents shall be maintained in a readily accessible location on the platform.
- (e) Reporting: On a semi-annual basis, a report detailing the previous six month's activities shall be provided to the APCD. The report must list all data required by the *Semi-Annual Compliance Verification Reports* condition of this permit.  
 [Re: APCD Rules 317, 322, 323, 324 and 1303, PTO 9111, 40 CFR 70.6]

C.8 **Facility Throughput Limitations.** Platform B production shall be limited to a monthly average of 38,000 barrels of oil emulsion<sup>6</sup> per day and 15 million standard cubic feet of produced gas per day. DCOR shall record in a log the volumes of oil emulsion and gas produced and the actual number of days in production per month. The above limits are based on actual days of operation during the month. [Re: PTO 9111]

---

<sup>6</sup> Oil emulsion is defined as the total amount of crude oil and water produced from the wells.



- C.9 **Produced Gas.** DCOR shall direct all produced gases to the sales compressors, the flare header or other permitted control device when de-gassing, purging or blowing down any oil and gas well or tank, vessel or container that contains reactive organic compounds or reduced sulfur compounds due to activities that include, but are not limited to, process or equipment turnarounds, process upsets (e.g., well spikes), well blow down and MMS ordered safety tests. [Re: APCD Rules 325, 331, PTO 9111]
- C.10 **Diesel IC Engines - Particulate Matter Emissions.** To ensure compliance with APCD Rules 205.A, 302, 304, 309 and the California Health and Safety Code Section 41701, DCOR shall implement manufacturer recommended operational and maintenance procedures to ensure that all project diesel-fired engines minimize particulate emissions. DCOR shall update and submit to APCD for approval their *IC Engine Particulate Matter Operation and Maintenance Plan* (12/20/94 and all APCD-approved updates thereof, to address the emergency IC engines) within 90 days of issuance of the final APCD/Part 70 PTO 9111-R3 (or other time period, if approved by the APCD). Upon such approval, DCOR shall implement the Plan for the life of the project. This Plan details the manufacturer recommended maintenance and calibration schedules that DCOR will implement. Where manufacturer guidance is not available, the recommendations of comparable equipment manufacturers and good engineering judgment shall be utilized. All project diesel-fired engines, regardless of exemption status, shall be included in this Plan. [Re: APCD Rules 205.A, 302, 305, 309, PTO 9111, ATC/PTO 10089]
- C.11. **Abrasive Blasting Equipment.** All abrasive blasting activities performed on Platform B shall comply with the requirements of the California Administrative Code Title 17, Sub-Chapter 6, Sections 92000 through 92530. [Re: PTO 9111]
- C.12 **Process Monitoring Systems - Operation and Maintenance.** All platform process monitoring devices listed in Section 4.10 of this permit shall be properly operated and maintained according to manufacturer recommended specifications. DCOR shall implement their *Process Monitor Calibration and Maintenance Plan* (submitted 1/6/95) for the life of the project. This Plan details the manufacturer recommended maintenance and calibration schedules. Where manufacturer guidance is not available, the recommendations of comparable equipment manufacturers and good engineering judgment shall be utilized. Within 90 days of the issuance of final Part 70 permit 9111-R3, DCOR shall submit a revised *Process Monitor Calibration and Maintenance Plan* for APCD review and approval. This revised Plan shall be updated to include the air compressor engine. [Re: PTO 9110]
- C.13 **Source Testing.** The following source testing provisions shall apply:
- (i) DCOR shall conduct source testing of air emissions and process parameters listed in Section 4.11 and Table 4.2 of this Permit to Operate. More frequent source testing may be required if the equipment does not comply with permitted limitations or if other compliance problems, as determined by the APCO, occur. Source testing of the North Crane engine shall be performed on a biennial schedule using June 1994 as the initial test date. The crane engine shall be loaded to the maximum safe load obtainable. Source testing of one crew boat and one supply boat shall occur on an annual basis; September is the anniversary month for such source testing every year. The crew and supply boat main engines shall be tested at normal cruise speeds (approximately 70 percent of maximum engine load).

- (ii) DCOR shall submit a written source test plan to the APCD for approval at least thirty (30) calendar days prior to initiation of each source test. The source test plan shall be prepared consistent with the APCD's *Source Test Procedures Manual* (revised May 1990 and any subsequent revisions). DCOR shall obtain written APCD approval of the source test plan prior to commencement of source testing. The APCD shall be notified at least ten (10) calendar days prior to the start of source testing activity to arrange for a mutually agreeable source test date when APCD personnel may observe the test.
- (iii) Source test results shall be submitted to the APCD within forty-five (45) calendar days following the date of source test completion and shall be consistent with the requirements approved within the source test plan. Source test results shall demonstrate compliance with emission rates in Section 5 and applicable permit conditions. All APCD costs associated with the review and approval of all plans and reports and the witnessing of tests shall be paid by DCOR as provided for by APCD Rule 210.
- (iv) Source test for an item of equipment shall be performed on the scheduled day of testing (the test day mutually agreed to) unless circumstances beyond the control of the operator prevent completion of the test on the scheduled day. Such circumstances include mechanical malfunction of the equipment to be tested, malfunction of the source test equipment, delays in source test contractor arrival and/or set-up, or unsafe conditions on site. Except in cases of an emergency, the operator shall seek and obtain APCD approval before deferring or discontinuing a scheduled test, or performing maintenance on the equipment item on the scheduled test day. If the test cannot be completed on the scheduled day, then the test shall be rescheduled for another time with prior authorization by the APCD. Failing to perform the source test of an equipment item on the scheduled test day without a valid reason and without APCD's prior authorization, except in the case of an emergency, shall constitute a violation of this permit. If a test is postponed due to an emergency, written documentation of the emergency event shall be submitted to the APCD by the close of the business day following the scheduled test day.  
[Re: PTO 9111]

The time period in (i), (ii), and (iii) above may be extended for good cause, provided a written request is submitted to the APCD at least three days in advance of the deadline, and approval for the extension is granted by the APCD.

- C.14 **Process Stream Sampling and Analysis.** DCOR shall sample and analyze the process streams listed in Section 4.11 and Table 4.3 of this permit. All process stream samples shall be taken according to APCD approved ASTM methods by a third party, and shall be analyzed within 72 hours from the time of collection. All sampling and analysis data/results shall be submitted to the APCD in accordance with the *Semi-Annual Monitoring/Compliance Verification Reports* condition (9.C.16) below. All sampling and analysis shall be traceable by chain of custody procedures. [Re: APCD Rules 325, 331, 333 PTO 9111]

C.15 **Recordkeeping.** All records and logs required by this permit and any applicable APCD, state or federal rule or regulation shall be maintained for a minimum of five calendar years from the date of information collection and log entry at the platform. These records or logs shall be readily accessible and be made available to the APCD upon request. [Re: APCD Rule 1303, PTO 9111, 40 CFR 70.6]

C.16 **Semi-Annual Monitoring/Compliance Verification Reports.** Twice a year, the permittee shall submit a monitoring and compliance verification report to the APCD. Each report shall be used to verify compliance with the prior two calendar quarters. The first report shall cover calendar quarters 1 and 2 (January through June) and shall be submitted no later than September 1. The second report shall cover calendar quarters 3 and 4 (July through December) and shall be submitted no later than March 1. Each report shall contain information necessary to verify compliance with the emission limits and other requirements of this permit. These reports shall be in a format approved by the APCD. All logs and other basic source data not included in the report shall be available to the APCD upon request. The second report shall also include an annual report for the prior four quarters. Pursuant to Rule 212, the annual report shall include a completed *APCD Annual Emissions Inventory* questionnaire, or submitted electronically via the APCD web site. The report shall include the following information:

(a) Internal Combustion Engines.

- (1) The daily, quarterly and annual operating hours (or fuel use) data for each pedestal crane engine in units of hours (or gallons).
- (2) The monthly and cumulative annual hours of operation for the emergency electrical generator (by ID number).
- (3) Results of the quarterly readings of the portable analyzer for the North Crane IC engine.
- (4) A statement that all fuel delivered to the boats or the platform was ultra low sulfur diesel. The APCD may request the records per condition 9.C.1.(c)(iv).
- (5) On an annual basis, the heating value of all diesel fuel, in units of Btu/gal.
- (6) Documentation of any equivalent routine IC engine replacement.
- (7) Summary results of all compliance emission source testing performed.

(b) Flare.

- (1) The hydrogen sulfide concentration for each flare event lasting more than one hour; also, (a) the highest annual hydrogen sulfide content and (b) the total sulfur content observed *annually*, in the flare header.
- (2) The total sulfur content of flare purge and pilot fuel gas as measured annually.
- (3) The volumes of gas (including natural gas and propane, if any) combusted and resultant mass emissions for each flare category (i.e., Purge/Pilot; Planned Continuous; Planned Other; Unplanned Other), shall be presented as a cumulative summary for each day, quarter and year.

(c) Fugitive Hydrocarbons. Rule 331/Fugitive I&M program data (on a quarterly basis):

- (1) Inspection summary.
- (2) Record of leaking components.
- (3) Record of leaks from critical components.
- (4) Record of leaks from components that incur five repair actions within a continuous 12-month period.

- (5) Record of component repair actions including dates of component re-inspections.
- (6) An updated FHC I&M inventory due to change in component list or diagrams.
- (7) Listing of components installed as BACT under APCD Rule 331 as approved by the APCD.

(d) Crew and Supply Boats.

- (1) Daily, quarterly and annual fuel use for the crew boat main engines and auxiliary engines while operating within 25 miles of Platform B, itemized by regular crew boat (controlled ICE) usage and spot charter/emergency response boat (uncontrolled ICE) usage.
- (2) Daily, quarterly and annual fuel use for the supply boat main engines and auxiliary engines (including the bow thruster engine) while operating within 25 miles of Platform B, itemized by regular crew boat (controlled ICE) usage and spot charter/emergency response boat (uncontrolled ICE) usage.
- (3) A statement that all fuel delivered to the boats or the platform was ultra low sulfur diesel. Records may be requested per condition 9.C.4.(d)(v).
- (4) Information regarding any new project boats servicing DCOR's Platform B, as detailed in *Permit Condition 9.C.4.(b) above*.
- (5) *If requested by the APCD staff, maintenance log summaries or other records that include details on injector timing, setting adjustments, major engine overhauls, and routine engine tune-ups. For spot charters this shall be provided as available.*
- (6) The number of boat trips made (a) by the crew and supply boats and (b) by the spot charter (crew and supply) boats, both itemized by the trip dates and the boat names.
- (7) Summary results of all compliance emission source testing performed.

(e) Pigging.

- (1) For each pig receiver and launcher, the number of pigging events per day, quarter and year.
- (2) The ROC/TOC ratio of the 'sales gas' used to purge and blanket each receiver and launcher prior to hatch opening, as measured semi-annually.

(f) Tanks/Sumps/Separators. On a daily basis, the amount of oily water processed in each floatation cell unit, in units of gallons.

(g) Solvent Usage. On a monthly basis: the amount of solvent used; the percentage of ROC by weight (as applied); the solvent density; the amount of solvent reclaimed; whether the solvent is photochemically reactive; and, the resulting emissions of ROC and photochemically reactive solvents to the atmosphere in units of pounds per month.

(h) General Reporting Requirements.

- (1) On a monthly basis, the total oil emulsion and produced gas production along with the number of days of production;
- (2) On quarterly basis, the emissions from each permitted emission unit for each criteria pollutant (shall include tons per quarter **totals of all pollutants** by each emission unit). The third/fourth quarter report shall include tons per year totals for all pollutants (by each emission unit).

- (3) On quarterly basis, the emissions from each exempt emission unit for each criteria pollutant (the annual report shall include the annual ROC and NO<sub>x</sub> emissions from all permit exempt activities).
- (4) Breakdowns and variances reported/obtained per Regulation V along with the excess emissions that accompanied each occurrence
- (5) A summary of each and every occurrence of non-compliance with the provisions of this permit, applicable APCD rules, and any other applicable air quality requirement.
- (6) The produced gas and produced oil process stream analyses as required by condition 9.C.14 of this permit (process stream analyses to be performed per Section 4.11)  
[Re: PTO 9111, ATC/PTO 9889, ATC/PTO 10089, 40 CFR 70.6]

C.17 **Permitted Equipment.** Only those equipment items listed in Attachment 10.4 are covered by the requirements of this permit and APCD Rule 201.B. [Re: APCD Rule 1303, PTO 9111]

C.18 **Mass Emission Limitations.** Emissions for the entire facility shall not exceed the total limits listed in Table 5.2. [Re: APCD Rule 1303, PTO 9111, ATC/PTO 10089, 40 CFR 70.6]

C.19 **Notification of Loss of Exemption.** Owners or operators of in-use stationary diesel-fueled CI engines, who are subject to an exemption specified in the ATCM from all or part of the requirements of the ATCM, shall notify the APCD immediately after they become aware that the exemption no longer applies and shall demonstrate compliance within 180 days after notifying the APCD.

C.20 **Documents Incorporated by Reference.** The documents listed below, including any APCD-approved updates thereof, are incorporated herein and shall have the full force and effect of a permit condition for this operating permit. These documents shall be implemented for the life of the project. Where noted below *in italics*, DCOR shall submit new or revised plans to the APCD.

- (i) Fugitive Emissions Inspection and Maintenance (I&M) Plan - Rule 331 (*approved September 2002*).
- (ii) IC Engine Particulate Matter Operation and Maintenance Plan (*last approved on 12/20/94. NOTE - DCOR shall submit to the APCD within 90-days of final permit issuance (or other time period, if approved by the APCD) an updated "IC Engines - Particulate Matter Operation and Maintenance Plan" for approval. See Permit Condition 9.C.10*).
- (iii) Flare Minimization and Monitoring Plan – Rule 359 (*approved 9/22/94, amended 12/13/94*).
- (iv) Emergency Episode Plan - Rule 603 (*submitted on July 23, 1994 and approved by APCD in November 1994, updated on November 30, 1998*).

- (v) Boat Monitoring Plan (*last approved on April 11, 2006*). DCOR shall submit an updated plan to the APCD for review and approval within 90 days of final permit issuance or other time period, if approved by the APCD.
- (vi) IC engine Rule 333 Inspection and Maintenance Plan (*NOTE - DCOR shall submit to the APCD by May 21, 2009 an updated "IC Engine Rule 333 Inspection and Maintenance Plan" for approval. See Permit condition 9.C.1(c)(ii).*
- (vii) IC Engine Rule 333 Compliance Plan (*NOTE – DCOR shall submit to the APCD by May 21, 2009 for approval*).
- (viii) Process Monitor Calibration and Maintenance Plan (*dated May 30, 2002*).  
[Re: APCD Rules 303, 317, 331, 333, 343, 359]

## 9.D **APCD-Only Conditions**

The following section lists permit conditions that are not enforceable by the USEPA or the public. However, these conditions are enforceable by the APCD and the State of California. These conditions are issued pursuant to APCD Rule 206 (*Conditional Approval of Authority to Construct or Permit to Operate*), which states that the Control Officer may issue an operating permit subject to specified conditions. Permit conditions have been determined as being necessary for this permit to ensure that operation of the facility complies with all applicable local and state air quality rules, regulations and laws. Failure to comply with any condition specified pursuant to the provisions of Rule 206 shall be a violation of that rule, this permit, as well as any applicable section of the California Health & Safety Code.

- D.1 **Nuisance (Rule 303).** No pollutant emissions from any source at DCOR shall create nuisance conditions. No operations shall endanger health, safety or comfort, nor shall they damage any property or business [*APCD Rule 303*].

AIR POLLUTION CONTROL OFFICER



MAR 09 2009

Date

### NOTES:

- (a) This permit supersedes all previous "APCD-only Permits to Operate" issued for Platform B; however each of the ATC's issued for Platform B remains in force.
- (b) APCD Permit Reevaluation Due Date: March 9, 2012
- (c) Part 70 Operating Permit Expiration Date: March 9, 2012





## **10.0 Attachments**

**10.1 *Emission Calculation Documentation***

**10.2 *Fee Calculations***

**10.3 *IDS Database Emission Tables***

**10.4 *Equipment List***

**10.5 *Exempt but Significant Equipment List***

**10.6 *Exempt and Insignificant Equipment List***

**10.7 *De-Permitted Equipment List***

**10.8 *Comments on Draft Permit***



## 10.1 EMISSION CALCULATION DOCUMENTATION

This attachment contains all relevant emission calculation documentation used for the emission tables in Section 5. Refer to Section 4 for the general equations. The letters A-H in the references below correspond to the same in Tables 5.1-1 and 5.1-2.

### Reference A – Diesel-fired IC Engines

- The maximum operating schedule is in units of hours.
- The default diesel fuel #2 characteristics are: (*Reference: AP-42 Appendix A 9/85, reformatted 1/95*)
  - Density = 7.05 lb/gal
  - LHV = 129,245 Btu/gal
  - HHV = 137,000 Btu/gal
- North Crane BSFC = 7,241 Btu/bhp-hr (energy based value using LHV).  
Detroit Diesel 6V-71 engine specification basis = 0.395 lb/bhp-hr.
- South Crane BSFC = 7,700 Btu/bhp-hr (energy based value using LHV).  
Detroit Diesel 3-71 engine specification basis = 0.420 lb/bhp-hr.
- 'Onan' Power Generator BSFC = 8,000 Btu/bhp-hr (estimated - energy based value using LHV).
- Air Compressor Engine BSFC = 8,000 Btu/bhp-hr (estimated - energy based value using LHV).
- Emission factors units (lb/MMBtu) are based on HHV.
- LCF (conversion of LHV to HHV) value of 6 percent used.
- NO<sub>x</sub> emission factor for the North crane IC engine per Rule 333, i.e., 797 ppmvd @ 15% O<sub>2</sub>:
 
$$EF_{lb/MMBtu} = 797 \text{ ppmvd} \times 2.59 \times 10^{-9} \times 46.01 \frac{lb \text{ No}_x}{lbmol} \times 8985 \times \left( \frac{20.9}{20.9 - 15.0} \right) = 3.02 \frac{lbs}{MMBtu}$$
- NO<sub>x</sub> emission factor for the South crane IC engine (Rule 333 standards-exempt):
 
$$EF_{lb/MMBtu} = \frac{14 \frac{g}{bhp-hr} \times 10^6 \frac{Btu}{MMBtu}}{453.6 \frac{g}{lb} \times 7700 \frac{Btu}{bhp-hr}} = 4.01 \frac{lbs}{MMBtu}$$

- NOx emission factor for the Rule 333-exempt 'Onan' generator IC engine is:

$$EF_{lb/MMBtu} = \frac{16 \frac{g}{bhp-hr} \times 10^6 \frac{Btu}{MMBtu}}{453.6 \frac{g}{lb} \times 8000 \frac{Btu}{bhp-hr}} = 4.41 \frac{lbs}{MMBtu}$$

- NOx emission factor for Rule 333-exempt air compressor IC engines is:

$$EF_{lb/MMBtu} = \frac{16 \frac{g}{bhp-hr} \times 10^6 \frac{Btu}{MMBtu}}{453.6 \frac{g}{lb} \times 8000 \frac{Btu}{bhp-hr}} = 4.41 \frac{lbs}{MMBtu}$$

- ROC, CO and PM emission factors based on USEPA AP-42, Table 3.3-1 (10/96).

- SO<sub>x</sub> emission factor mass balance equation (as SO<sub>2</sub>):

$$SO_x EF_{lb/MMBtu} = \frac{(\%S) \times \left( \rho_{oil} \frac{lb}{gal} \right) \times \left( \frac{1 \text{ gmol } S}{32 \text{ g}} \right) \times \left( \frac{1 \text{ gmol } SO_2}{1 \text{ gmol } S} \right) \times \left( \frac{64 \text{ g}}{1 \text{ gmol } SO_2} \right)}{\left( HHV \frac{Btu}{gal} \right) \times \left( 10^{-6} \frac{MMBtu}{Btu} \right)}$$

- PM<sub>10</sub>:PM ratio = 1.0 (per AP-42).
- ROC:TOC ratio = 0.8378. ROC emission factor based on SBCAPCD "VOC/ROC Emission Factors and Reactivities for Common Source Types" dated 03/12/01 (ver 1.2) for Piston IC Engine: Diesel.
- Crane engine operational limits: General Equation:

$$Q = \frac{\left( BSFC \frac{Btu}{bhp-hr} \right) \times bhp \times (LCF) \times \left( \frac{hours}{time \ period} \right)}{\left( HHV \frac{Btu}{gal} \right)}$$

North Crane Engine Equation:

$$Q_{daily} = \frac{\left( 7,241 \frac{Btu}{bhp-hr} \right) \times (230 \text{ bhp}) \times (1.06) \times \left( \frac{24 \text{ hours}}{day} \right)}{\left( 137,000 \frac{Btu}{gal} \right)} = 309 \frac{gal}{day}$$

$$Q_{quarterly} = \frac{\left(7,241 \frac{Btu}{bhp-hr}\right) \times (230 bhp) \times (1.06) \times \left(\frac{500 hours}{quarter}\right)}{\left(137,000 \frac{Btu}{gal}\right)} = 6,443 \frac{gal}{qtr}$$

$$Q_{annual} = \frac{\left(7,241 \frac{Btu}{bhp-hr}\right) \times (230 bhp) \times (1.06) \times \left(\frac{1000 hours}{year}\right)}{\left(137,000 \frac{Btu}{gal}\right)} = 12,886 \frac{gal}{yr}$$

South Crane Engine Equation:

$$Q_{daily} = \frac{\left(7,700 \frac{Btu}{bhp-hr}\right) \times (109 bhp) \times (1.06) \times \left(\frac{24 hours}{day}\right)}{\left(137,000 \frac{Btu}{gal}\right)} = 155 \frac{gal}{day}$$

$$Q_{quarterly} = \frac{\left(7,700 \frac{Btu}{bhp-hr}\right) \times (109 bhp) \times (1.06) \times \left(\frac{100 hours}{quarter}\right)}{\left(137,000 \frac{Btu}{gal}\right)} = 649 \frac{gal}{qtr}$$

$$Q_{annual} = \frac{\left(7,700 \frac{Btu}{bhp-hr}\right) \times (109 bhp) \times (1.06) \times \left(\frac{200 hours}{year}\right)}{\left(137,000 \frac{Btu}{gal}\right)} = 1,298 \frac{gal}{yr}$$

#### Reference B - Combustion Flare

- The maximum operating schedule for the purge/pilot gas and planned continuous flaring is in units of hours.
- The maximum operating schedule for the planned other and unplanned flaring is in units of percentage of annual usage.
- Purge and pilot flow rate based on original application.
- HHV = 1100 Btu/scf for all flare gas (per original application).

- Planned continuous flaring value based on one half the minimum detection limit of the flare meter.  
     Flare meter: Daniels 8-inch orifice meter  
     Minimum detection limit: 0.0075 MMscfd (APCD assumption based on 0.25 scf/sec flow rate). Value agreed upon by DCOR and the APCD.  
     Maximum detection limit: 10.0 MMscfd
- Planned intermittent (other) and unplanned flaring volumes agreed upon by DCOR and the APCD.
- Planned intermittent (other) and unplanned flaring events not calculated for short-term events per APCD policy.
- The same emission factors are used for all flaring scenarios.
- NO<sub>x</sub>, ROC and CO emission factors based on USEPA AP-42 Chapter 13.5 Industrial Flares, Table 13.5-1 (9/91, reformatted 1/95).
- PM<sub>10</sub>:PM ratio = 1.0. PM emission factor based on SBCAPCD Flare Study - Phase I Report, Table 3.1.1 (7/91).
- ROC:TOC ratio = 0.41. ROC emission factor based on SBCAPCD "*VOC/ROC Emission Factors and Reactivities for Common Source Types*" dated 03/12/01 (ver 1.2) for Flares, Thermal Oxidizers, Incinerators.
- SO<sub>x</sub> emissions based on mass balance:  

$$SO_x(\text{as } SO_2) = \frac{(0.169) \times (ppmv S)}{HHV}$$

#### Reference C - Fugitive Components

- The maximum operating schedule is in units of hours.
- All safe to monitor components are credited an 80 percent control efficiency. Unsafe to monitor components (as defined in Rule 331) are considered uncontrolled.
- The component leak path definition differs from the Rule 331 definition of a component. A typical leak path count for a valve would be equal to 4 (one valve stem, a bonnet connection and two flanges).
- Leak path counts and 'de minimis changes' updates are provided by applicant. The total count has been verified to be accurate within 5 percent of the APCD's P&ID and platform review/site checks. The current de minimis list was included in the last CVR submittal in September of 2008.

- Emission factors based on the SBCAPCD/Tecolote Report, *Modeling of Fugitive Hydrocarbon Emissions* (January 1986), Model B. These are, as follows:

$$EF_{Oil\ Side, Unsafe / Uncontrolled} = 0.0133 \times 0.33 = 0.0044 \frac{lbROC}{day - clp}$$

$$EF_{Gas\ Side, Unsafe / Uncontrolled} = 0.223 \times 0.33 = 0.0736 \frac{lbROC}{day - clp}$$

***½-Inch or Smaller Diameter Stainless Steel 'fitting':*** This renewal permit includes ½-inch or smaller diameter stainless steel fittings in the equipment list. Emissions from these components have not been quantified since their emission factors have not been established. Also, note that these emissions do not constitute a net emissions increase since the fittings existed prior to 1990.

#### Reference D - Supply Boat

- The maximum operating schedule is in units of hours.
- Supply boat engine data based on Rincon Marine's *M/V Santa Cruz*.
- Two 2,000 bhp main engines (i.e., 4,000 bhp), two 245 bhp auxiliary engines (i.e., 490 bhp) and one 515 bow thruster engine are utilized.
- Main engine load factor based on APCD *Crew and Supply Boat* study (6/87).
- Supply boat bow thruster engine only operates during maneuver mode.
- Supply boat generator engines provide half of total rated load, either with one engine at full load or both engines at half load.
- Total time supply boat operates per trip within 25 miles of platform is 11 hours. A trip includes time traveling to and from the platform, as well as time operating at the platform. Typical trip is: 8 hours cruise, 2 hours maneuver and 1 hour idle. Annual time based on  $52/5 = 10.4$  trips. Quarterly based on  $26/5 = 5.2$  trips. Spot charter boats add  $11 \times 10.4/10 = 11.4$  hours per year.
- Main engine emission factors are based only on cruise mode values.
- The break specific fuel consumption (BSFC) for the controlled main engines is 0.345 lb/bhp-hr. This value is from data supplied by Caterpillar for operation of each engine at 1,340 bhp. This bhp was used to select the BSFC because the engines are assumed to operate at 65% of full capacity during normal operations.

- The default diesel fuel #2 characteristics are: (Reference: AP-42 Appendix A 9/85, reformatted 1/95)

Density = 7.05 lb/gal

LHV = 129,245 Btu/gal

HHV = 137,000 Btu/gal

- The BSFC was converted from lb/hp-hr to gal/hp-hr by dividing the manufacturer's BSFC by 7.05 lb/gal, the density of diesel:

$$BSFC = 0.049 \frac{\text{gal}}{\text{bhp} - \text{hr}} = \frac{\left(0.345 \frac{\text{lb}}{\text{bhp} - \text{hr}}\right)}{\left(7.05 \frac{\text{lb}}{\text{gal}}\right)}$$

- Supply boat main engines achieve a controlled NO<sub>x</sub> emission rate of 5.99 g/bhp-hr through the use of Caterpillar 3516B diesel fired engines. The engines are electronically controlled, turbo-charged, and after-cooled. This emission factor equates to 270 lb/1000 gallons.

$$EF_{NO_x} = \frac{\left(5.99 \frac{\text{g}}{\text{bhp} - \text{hr}}\right) \times 1,000}{\left(0.049 \frac{\text{gal}}{\text{bhp} - \text{hr}}\right) \times \left(453.6 \frac{\text{g}}{\text{lb}}\right)} = 270 \frac{\text{lb}}{1,000 \text{ gal}}$$

- Spot charter supply boat usage limited to 10 percent of actual annual controlled supply boat usage.
- Spot charter and Emergency Response vessels are normally uncontrolled for NO<sub>x</sub>.
- Uncontrolled ROC and CO emission factors for the main engines are based on USEPA AP-42, Volume II, Table II-3.3 (1/75) {cruise factor, 2,000 bhp/engine}.
- Uncontrolled NO<sub>x</sub> emissions from spot charter supply and emergency response boat main engines based on an emission rate of 14 g/bhp-hr. This emission factor equates to 561 lb/1000 gallons:

$$EF_{NO_x} = \frac{\left(14 \frac{\text{g}}{\text{bhp} - \text{hr}}\right) \times 1,000}{\left(0.055 \frac{\text{gal}}{\text{bhp} - \text{hr}}\right) \times \left(453.6 \frac{\text{g}}{\text{lb}}\right)} = 561 \frac{\text{lb}}{1,000 \text{ gal}}$$

- PM emission factor for the main engines are based on Kelly, et. al. (1981).
- Main and Auxiliary Engine PM<sub>10</sub>:PM ratio = 1.00 (per AP-42).
- Main Engine ROC:TOC ratio = 1.0. ROC emission factor based on SBCAPCD "VOC/ROC Emission Factors and Reactivities for Common Source Types" dated 03/12/01 (ver 1.2) for Crew and Supply Boat Main Engines.



- Auxiliary Engine ROC:TOC ratio = 0.8378. ROC emission factor based on SBCAPCD "VOC/ROC Emission Factors and Reactivities for Common Source Types" dated 03/12/01 (ver 1.2) for Crew and Supply Boat: Auxiliary Engines.

- SO<sub>x</sub> emission factor mass balance equation (as SO<sub>2</sub>):

$$SO_x EF_{lb/1000gal} = (\%S) \times \left( g_{oil} \frac{lb}{gal} \right) \times \left( \frac{1 gmol S}{32 g} \right) \times \left( \frac{1 gmol SO_2}{1 gmol S} \right) \times \left( \frac{64 g}{1 gmol SO_2} \right) \times \left( \frac{1000 gal}{1000 gal} \right)$$

- Auxiliary and bow thruster engine emission factors (diesel uncontrolled) are based on USEPA AP-42, Table 3.3-1 (10/96). Table emission factors converted to fuel basis using:

$$EF_{lb/1000gal} = (TOC EF_{lb/MMBtu}) \times \left[ \frac{\left( \frac{ROC}{TOC} ratio \right) \times \left( 19,432 \frac{Btu}{lb} \right) \times \left( 7.05 \frac{lb}{gal} \right)}{1000} \right]$$

- Spot charter engine set-up assumed to be equal to main supply boat.
- Emergency response vessel is permanently assigned to Platforms Henry, Hillhouse, A, B, C, Houchin, Hogan, Habitat, Hondo, Heritage, and Harmony. Vessel total bhp is 1,770 bhp. Short-term emissions from this vessel are not assessed. Long-term emissions are assessed equally amongst the eleven affected platforms.
- Emergency response vessel emissions calculated as an aggregate (main and auxiliary engines) using the uncontrolled supply boat emission factors. The long term hours of operating are back-calculated based on the fuel usage allocation for this platform of 4,546 gallons per year (50,000 gal/yr basis).

$$T_{yr} = \frac{4,546 \frac{gal}{year}}{\left( 0.055 \frac{gal}{bhp-hr} \right) \times (1,770 bhp) \times 0.65} = 72 \frac{hr}{yr}$$

- Main and auxiliary engine operational limits: General Equation

$$Q = \left( BSFC \frac{gal}{bhp-hr} \right) \times bhp \times \left( \frac{hours}{time period} \right) \times (load factor)$$

Main engines:

$$Q_{daily} = \left( 0.049 \frac{gal}{bhp-hr} \right) \times 4,000 bhp \times \left( \frac{11 hours}{day} \right) \times (0.65) = 1,400 \frac{gal}{day}$$

$$Q_{quarterly} = \left( 0.049 \frac{gal}{bhp-hr} \right) \times 4,000 bhp \times \left( \frac{57.2 hours}{quarter} \right) \times (0.65) = 7,278 \frac{gal}{qtr}$$

$$Q_{annual} = \left( 0.049 \frac{gal}{bhp-hr} \right) \times 4,000 bhp \times \left( \frac{114.4 hours}{year} \right) \times (0.65) = 14,556 \frac{gal}{yr}$$

Auxiliary engines – Generators

$$Q_{daily} = \left( 0.055 \frac{gal}{bhp-hr} \right) \times 490 bhp \times \left( \frac{11 hours}{day} \right) \times (0.50) = 148 \frac{gal}{day}$$

$$Q_{quarterly} = \left( 0.055 \frac{gal}{bhp-hr} \right) \times 490 bhp \times \left( \frac{57.2 hours}{quarter} \right) \times (0.50) = 771 \frac{gal}{qtr}$$

$$Q_{annual} = \left( 0.055 \frac{gal}{bhp-hr} \right) \times 490 bhp \times \left( \frac{114.4 hours}{year} \right) \times (0.50) = 1,542 \frac{gal}{yr}$$

Auxiliary engines - Bow Thruster

$$Q_{daily} = \left( 0.055 \frac{gal}{bhp-hr} \right) \times 515 bhp \times \left( \frac{2 hours}{day} \right) = 57 \frac{gal}{day}$$

$$Q_{quarterly} = \left( 0.055 \frac{gal}{bhp-hr} \right) \times 515 bhp \times \left( \frac{10.4 hours}{quarter} \right) = 295 \frac{gal}{qtr}$$

$$Q_{annual} = \left( 0.055 \frac{gal}{bhp-hr} \right) \times 515 bhp \times \left( \frac{20.8 hours}{year} \right) = 589 \frac{gal}{yr}$$

#### Reference E1 - Crew Boat

- The maximum operating schedule is in units of hours.
- Crew boat engine data based on So Cal Ship Services' M/V *Alan T.*
- Three 510 bhp main engines (i.e.; 1,530 bhp) and two 109 bhp auxiliary engines are utilized.
- Main engine load factor based on APCD *Crew and Supply Boat* study (6/87).
- Crew boat auxiliary engines operate at one-half of total rated load.
- Total time crew boat operates per trip within 25 miles of platform is 3.5 hours per platform. A trip includes time to, from and at the platform. Typical trip is: 2 hours cruise, 1 hour maneuver and 0.5 hour idle. Annual time based on  $1,500/5 = 300$  trips. Quarterly based on  $375/5 = 75$  trips. Spot charter boats add  $3.5 \times 300/10 = 105$  hours.

- Main engine emission factors are based only on cruise mode values.
- Crew boat main engines achieve a controlled NO<sub>x</sub> emission rate of 8.4 g/bhp-hr through the use of turbo-charging, enhanced inter-cooling and 4° timing retard. This emission factor equates to 337 lb/1000 gallons.

$$EF_{NO_x} = \frac{\left(8.4 \frac{g}{bhp-hr}\right) \times 1,000}{\left(0.055 \frac{gal}{bhp-hr}\right) \times \left(453.6 \frac{g}{lb}\right)} = 337 \frac{lb}{1,000 gal}$$

- Spot charter crew boat usage limited to 10 percent of actual annual controlled crew boat usage.
- Spot charter vessels are normally uncontrolled for NO<sub>x</sub>.
- Uncontrolled ROC and CO emission factors for the main engines are based on USEPA AP-42, Volume II, Table II-3.3 (1/75) {cruise factor, 500 bhp engine}.
- Uncontrolled NO<sub>x</sub> emissions from spot charter crew boat main engines based on an emission rate of 14 g/bhp-hr. This emission factor equates to 561 lb/1000 gallons:

$$EF_{NO_x} = \frac{\left(14 \frac{g}{bhp-hr}\right) \times 1,000}{\left(0.055 \frac{gal}{bhp-hr}\right) \times \left(453.6 \frac{g}{lb}\right)} = 561 \frac{lb}{1,000 gal}$$

- PM emission factor for the main engines are based on *Kelly, et. al.* (1981).
- PM<sub>10</sub>:PM ratio = 0.96.
- ROC:TOC ratio = 1.0.

- All SO<sub>x</sub> emissions based on mass balance:

$$SO_x EF_{lb/1000 gal} = (\%S) \times \left(9_{oil} \frac{lb}{gal}\right) \times \left(\frac{1 gmol S}{32 g}\right) \times \left(\frac{1 gmol SO_2}{1 gmol S}\right) \times \left(\frac{64 g}{1 gmol SO_2}\right) \times \left(\frac{1000 gal}{1000 gal}\right)$$

- Auxiliary engine emission factors (uncontrolled) are based on USEPA AP-42, Table 3.3-1 (10/96). Table emission factors converted to fuel basis using:

$$EF_{lb/1000 gal} = (TOC EF_{lb/MMBtu}) \times \left[ \frac{\left(\frac{ROC}{TOC} ratio\right) \times \left(19,432 \frac{Btu}{lb}\right) \times \left(7.05 \frac{lb}{gal}\right)}{1000} \right]$$

- Spot charter engine set-up (i.e., engine type, size) assumed to be equal to main crew boat.

- Main and auxiliary engine operational limits: General Equation

$$Q = \left( BSFC \frac{gal}{bhp-hr} \right) \times bhp \times \left( \frac{hours}{time\ period} \right) \times (load\ factor)$$

Main engines

$$Q_{daily} = \left( 0.055 \frac{gal}{bhp-hr} \right) \times 1,530 bhp \times \left( \frac{17.5\ hours}{day} \right) \times (0.85) = 1,252 \frac{gal}{day}$$

$$Q_{quarterly} = \left( 0.055 \frac{gal}{bhp-hr} \right) \times 1,530 bhp \times \left( \frac{262.5\ hours}{quarter} \right) \times (0.85) = 18,776 \frac{gal}{qtr}$$

$$Q_{annual} = \left( 0.055 \frac{gal}{bhp-hr} \right) \times 1,530 bhp \times \left( \frac{1050\ hours}{year} \right) \times (0.85) = 75,104 \frac{gal}{yr}$$

Auxiliary engines - Generators

$$Q_{daily} = \left( 0.055 \frac{gal}{bhp-hr} \right) \times 218 bhp \times \left( \frac{17.5\ hours}{day} \right) \times (0.50) = 105 \frac{gal}{day}$$

$$Q_{quarterly} = \left( 0.055 \frac{gal}{bhp-hr} \right) \times 218 bhp \times \left( \frac{262.5\ hours}{quarter} \right) \times (0.50) = 1,574 \frac{gal}{qtr}$$

$$Q_{annual} = \left( 0.055 \frac{gal}{bhp-hr} \right) \times 218 bhp \times \left( \frac{1050\ hours}{year} \right) \times (0.50) = 6,295 \frac{gal}{yr}$$

#### Reference F - Pigging Equipment

- Maximum operating schedule is in units of events (e.g., thrice per week/160 times per year for oil receiver/launcher and thrice per week/160 times per year for gas receiver/launcher).
- The gas & oil launcher volumes, pressures, and temperatures based on file data.
- All vapors in the launcher is bled down to *either the well clean tank or the waste oil tank*; all launchers and receivers are then purged and blanketed with 'sales gas' prior to opening the vessels to the atmosphere; The remaining vessel pressure is no greater than 1 psig, based on Nuevo's 5/7/97 and 8/19/97 stipulations to the APCD. The temperatures of the remaining vapor in the vessels are as follows: (a) pig launchers temp. = 75°F, and (b) pig receivers temp. = 65°F (based on application 9846 data).

- The  $MW_{gas} = MW_{oil} = 23 \text{ lb./lb.-mol}$ , since the launchers/receivers are purged and blanketed with sales gas in either cases (*Reference: 5/7/97 and 8/19/97 letters from Nuevo*).
  - Average ROC weight percent is = 15.27 % for gas launchers. [*Reference: see Attached Field Test Data from OCS Platforms, submitted by on 5/7/97 and revised on 8/19/97*]
  - Average ROC weight percent is = 15.27 % for oil launchers. [*Reference: see Attached Field Test Data from OCS Platforms, submitted on 5/7/97 and revised on 8/19/97*]
  - Pig vessel volume ( $V_{ves}$ ) = 10.0 acf (all launchers) and 2.00 acf (all receivers) {per DCOR data}, as indicated in Table 5.1-1 in the PTO.
  - Density  $\rho = (\text{pressure} \times MW) \div (R \times T)$ , density of vapor remaining in the vessel (lbs. VOC/acf).
  - Site-specific pigging emission factor  $EF = (\rho \times \text{ROC weight \%})$ , in (lb. ROC/acf-event) units.
  - $\rho_{gas} = \rho_{oil} = (15.7 \times 23) \div (10.73 \times 535) = 0.0629 \text{ lb./cu.ft}$ , density of THC vapor remaining in vessel, i.e., 0.0629 lb./cubic feet TOC for oil/gas launchers.
  - $\rho_{gas} = \rho_{oil} = (15.7 \times 23) \div (10.73 \times 525) = 0.0641 \text{ lb./cu.ft}$ , density of THC vapor remaining in vessel, i.e., 0.0641 lb./cubic feet TOC for oil/gas receivers.
- $EF = 0.0629 \times 0.1527 = 0.0096 \text{ lb. of ROC/acf-event for oil/gas launchers.}$   
 $= 0.0641 \times 0.1527 = 0.0098 \text{ lb. of ROC/acf-event for oil/gas receivers}$

#### Reference G - Sumps/Tanks/Separators

- Maximum operating schedule is in units of hours.
- Emission calculation methodology for tanks, sumps, and oil/water separators (Wemco flotation units) based on the CARB/KVB report *Emissions Characteristics of Crude Oil Production Operations in California* (1/83).
- Calculations of tank and sump emissions are based on surface area of emissions unit as supplied by the applicant.
- All tanks and sumps are classified as secondary production and heavy oil service.
- Emission factor for flotation cell is controlled by 95 percent (560 lb ROC/MMgal uncontrolled). Calculations of oil/water separator emissions are based on the daily throughput in MMgal/day as supplied by the applicant.

- All tanks, sumps, and separators are connected to vapor recovery or flare. A control efficiency of 95% is assumed for all vessels.

#### Reference H - Solvents

- All solvents not used to thin surface coatings are included in this equipment category.
- Daily, quarterly and annual emission rates per application.
- Hourly emissions based on daily value divided by an average 8-hour day. Compliance with hourly data to be based on daily actual usage divided by 8.
- Emissions based on usage of 3,009 gallons per year with no APCD-approved reclamation program.

## **10.2 Fee Calculations**

Emission fees for Platform B are based on a cost reimbursement basis pursuant to APCD Rule 210.

All work performed with respect to implementing the requirements of the Part 70 Operating Permit program are assessed on a cost reimbursement basis (*Reference: APCD Rule 210.I.C*), pursuant to APCD Rule 1304.D.11.





### 10.3

### IDS Database Emission Tables

**Table 1**  
**Permitted Potential to Emit (PPTE)**

	NO <sub>x</sub>	ROC	CO	SO <sub>x</sub>	TSP	PM <sub>10</sub>
<b>PTO 9111- Reeval issued in March 2009</b>						
lb/day	1985.16	341.83	351.06	0.91	126.17	124.34
tons/year	26.45	46.44	19.73	1.33	2.90	2.84

*Reference: Table 5.2*

**Table 2**  
**Facility Potential to Emit (FPTE)\***

	NO <sub>x</sub>	ROC	CO	SO <sub>x</sub>	TSP	PM <sub>10</sub>
<b>PTO 9111- Reeval issued in March 2009</b>						
lb/day	1985.16	341.83	351.06	0.91	126.17	124.34
tons/year	26.45	46.44	19.73	1.33	2.90	2.84

*Reference: Table 5.2*

**Table 3**

**Federal Potential to Emit (PT 70 FPTE)\***

	<b>NO<sub>x</sub></b>	<b>ROC</b>	<b>CO</b>	<b>SO<sub>x</sub></b>	<b>TSP</b>	<b>PM<sub>10</sub></b>
<b>PTO 9111- Reeval issued in March 2009</b>						
lb/day	2048.70	171.45	364.75	0.91	130.64	128.71
Tons/year	41.00	16.08	22.87	1.53	3.93	3.82

*Reference: Table 5.3*

**Table 4**

**Facility Net Emission Increase Since 1990 (FNEI-90)**

	<b>NO<sub>x</sub></b>	<b>ROC</b>	<b>CO</b>	<b>SO<sub>x</sub></b>	<b>TSP</b>	<b>PM<sub>10</sub></b>
<b>PTO 9111- Reeval issued in March 2009</b>						
lb/day		18.48				
tons/year	0.16	3.37				

*Reference: Table 5.5*

**Table 5**  
**Facility Exempt Emissions (FXMT)\***

	NO <sub>x</sub>	ROC	CO	SO <sub>x</sub>	TSP	PM <sub>10</sub>
<b>PTO 9111- Reeval issued in March 2009</b>						
tons/qtr	2.90	0.43	0.62	0.00	0.20	0.20
tons/year	11.60	1.02	2.50	0.00	0.82	0.80

*Reference: Table 5.4*



## 10.4 Equipment List

<u>Section</u>	<u>Name</u>
1.	IC Engines:
2.	Fixed Roof Storage Tanks:
3.	Compressors:
4.	Pumps:
5.	Pigging Equipment:
6.	Pressure Vessels:
7.	Heat exchangers:
8.	Flares and Thermal Oxidizers:
9.	Fugitive Components:
10.	Wellheads:
11.	Sumps/Separators/Wastewater Tanks:
12.	Oil/Water Separators:
13.	Supply Boat
14.	Crew Boat
15.	Solvent Usage

## Santa Barbara County APCD – Equipment List

PT-70/Reeval 09111 R3 / FID: 08004 Platform B / SSID: 08003

### A PERMITTED EQUIPMENT

#### 1 Stationary IC Engines

##### 1.1 IC Engine: 25-Ton Pedestal Crane (North Crane)

<i>Device ID #</i>	<b>004887</b>	<i>Device Name</i>	<b>IC Engine: 25-Ton Pedestal Crane (North Crane)</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	230.00 Brake Horsepower
<i>Manufacturer</i>	GM (Valve Cover Label)	<i>Operator ID</i>	BDRLDECK
<i>Model</i>	6055C (Valve Cover Label)	<i>Serial Number</i>	6A-24739 (Valve Cover Label)
<i>Location Note</i>	UTM E 980,915 UTM N 804,800		
<i>Device Description</i>	Rated BHP (max) @ 2100 rpm. B injectors used as emissions controls. Diesel fuel. Lean engine type. Stack height above water = 92 ft. Stack diameter = 0.33 ft. Exhaust gas flow rate = 2690 dscfm. Exhaust gas temp = 700 deg F.		

##### 1.2 IC Engine: 15-Ton Pedestal Crane (South Crane)

<i>Device ID #</i>	<b>004886</b>	<i>Device Name</i>	<b>IC Engine: 15-Ton Pedestal Crane (South Crane)</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	109.00 BTU/bhp-hr
<i>Manufacturer</i>	Detroit Diesel	<i>Operator ID</i>	BRRLDECK
<i>Model</i>	3-71	<i>Serial Number</i>	3A85202 1033-5100
<i>Location Note</i>	UTM E 980,915 UTM N 804,800		
<i>Device Description</i>	Rated BHP (max) @ 2100 rpm. B injectors used as emissions controls. Diesel fuel. Lean engine type. Stack height above water = 90 ft. Stack diameter = 0.25 ft. Exhaust gas flow rate = 1,140 dscfm. Exhaust gas temp = 825 deg F.		

## 2 Fixed Roof Storage Tanks

### 2.1 Glycol Dehydrator Tank

<i>Device ID #</i>	102100	<i>Device Name</i>	Glycol Dehydrator Tank
<i>Rated Heat Input</i>		<i>Physical Size</i>	168.00 Gallons
<i>Manufacturer</i>		<i>Operator ID</i>	528-B-PROD
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device</i>	Horizontal type tank in glycol regeneration service (stores glycol).		
<i>Description</i>	Connected to vapor recovery with 95% recovery control efficiency. Vapor molecular weight = 50 lb/lb-mol. Vapor Pressure = 0.3 psia. Annual net throughput = 200 barrels/year.		

### 2.2 Glycol Reboiler Tank

<i>Device ID #</i>	102102	<i>Device Name</i>	Glycol Reboiler Tank
<i>Rated Heat Input</i>		<i>Physical Size</i>	546.00 Gallons
<i>Manufacturer</i>		<i>Operator ID</i>	528-B-PROD
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	UTM E 980,915 UTM N 804,800		
<i>Device</i>	Horizontal type tank in glycol regeneration service (stores glycol).		
<i>Description</i>	Connected to vapor recovery with 95% recovery control efficiency. Vapor molecular weight = 50 lb/lb-mol. Vapor Pressure = 0.3 psia. Annual net throughput = 5 barrels/year. Stack height above water = 90 ft. Stack diameter = 0.83 ft. Exhaust gas flow rate = nominal. Exhaust gas temp = ambient.		

### 3 Compressors

#### 3.1 Rotary Gas Compressor (GC #1)

<i>Device ID #</i>	<b>102105</b>	<i>Device Name</i>	<b>Rotary Gas Compressor (GC #1)</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	300.00 Horsepower (Electric Motor)
<i>Manufacturer</i>	A.C. Compressor Corp.	<i>Operator ID</i>	528-B-PROD
<i>Model</i>	219 M	<i>Serial Number</i>	CBA-235
<i>Location Note</i>	Production Deck.		
<i>Device</i>	Rated capacity 1740 scfm, powered by 300 hp electric motor.		
<i>Description</i>	Housing/seals connected to vapor recovery (BACT #95934.00). Start date = 1994.		

#### 3.2 Rotary Gas Compressor (GC #1)

<i>Device ID #</i>	<b>102104</b>	<i>Device Name</i>	<b>Rotary Gas Compressor (GC #1)</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	250.00 Horsepower (Electric Motor)
<i>Manufacturer</i>	A.C. Compressor Corp.	<i>Operator ID</i>	528-B-PROD
<i>Model</i>	219 M	<i>Serial Number</i>	4006-40610-1
<i>Location Note</i>	Production Deck		
<i>Device</i>	Rated capacity 1740 scfm, powered by 250 hp electric motor.		
<i>Description</i>	Housing/seals not connected to vapor recovery.		

#### 3.3 Vapor Compressor

<i>Device ID #</i>	<b>102135</b>	<i>Device Name</i>	<b>Vapor Compressor</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	10.00
<i>Manufacturer</i>	Ingersoll-Rand	<i>Operator ID</i>	528-B-PROD
<i>Model</i>	55	<i>Serial Number</i>	
<i>Location Note</i>	Sub Deck		
<i>Device</i>	Rated capacity 62 scfm (2 cylinders @ 31 cfm each). Powered by 10 hp electric motor, housing/seals not connected to vapor recovery.		
<i>Description</i>	Start date = 1999.		



## 4 Pumps

### 4.1 Water Charge Pump #1

<i>Device ID #</i>	<b>102131</b>	<i>Device Name</i>	<b>Water Charge Pump #1</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	50.00 Horsepower (Electric Motor)
<i>Manufacturer Model</i>		<i>Operator ID Serial Number</i>	657-F-201
<i>Location Note</i>	Production Deck		
<i>Device Description</i>	Powered by 50 hp electric motor. Dual seals not utilized.		

### 4.2 Water Charge Pump #2

<i>Device ID #</i>	<b>102132</b>	<i>Device Name</i>	<b>Water Charge Pump #2</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	50.00 Horsepower (Electric Motor)
<i>Manufacturer Model</i>	WEG	<i>Operator ID Serial Number</i>	657-F-201
<i>Location Note</i>	Production Deck		
<i>Device Description</i>	Powered by 50 hp electric motor. Dual seals not utilized.		

### 4.3 Water Charge Pump #3

<i>Device ID #</i>	<b>102133</b>	<i>Device Name</i>	<b>Water Charge Pump #3</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	50.00 Horsepower (Electric Motor)
<i>Manufacturer Model</i>	WEG	<i>Operator ID Serial Number</i>	657-F-201
<i>Location Note</i>	Production Deck		
<i>Device Description</i>	Powered by 50 hp electric motor. Dual seals not utilized.		

#### 4.4 Water Injection Pump #1

<i>Device ID #</i>	<b>102134</b>	<i>Device Name</i>	<b>Water Injection Pump #1</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	200.00 Horsepower (Electric Motor)
<i>Manufacturer</i>	US Electric Motors	<i>Operator ID</i>	657-F-101
<i>Model</i>	HV-4	<i>Serial Number</i>	D-7007942
<i>Location Note</i>	Production Deck		
<i>Device Description</i>	Rated capacity 303.3 gpm. Powered by 200 hp electric motor. Fluid pumped = water. Dual seals not utilized.		

#### 4.5 Shipping Pump #3

<i>Device ID #</i>	<b>102136</b>	<i>Device Name</i>	<b>Shipping Pump #3</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	Horsepower (Electric Motor)
<i>Manufacturer</i>	REDA	<i>Operator ID</i>	657-F-201
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Production Deck		
<i>Device Description</i>	Powered by electric motor. Fluid Pumped = oil and water.		

#### 4.6 Shipping Pump #4

<i>Device ID #</i>	<b>102137</b>	<i>Device Name</i>	<b>Shipping Pump #4</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	REDA	<i>Operator ID</i>	657-F-201
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Production Deck		
<i>Device Description</i>	Powered by electric motor. Fluid Pumped = oil and water.		

#### 4.7 Shipping Pump #5

<i>Device ID #</i>	102138	<i>Device Name</i>	Shipping Pump #5
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	REDA	<i>Operator ID</i>	657-F-201
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Production Deck		
<i>Device</i>	Powered by electric motor. Fluid Pumped = oil and water.		
<i>Description</i>			

#### 4.8 Fire Pump #1

<i>Device ID #</i>	102139	<i>Device Name</i>	Fire Pump #1
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	REDA	<i>Operator ID</i>	657-F-201
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Production deck		
<i>Device</i>	Powered by electric motor. Fluid Pumped = sea water.		
<i>Description</i>			

#### 4.9 Water Injection Pump #2

<i>Device ID #</i>	102140	<i>Device Name</i>	Water Injection Pump #2
<i>Rated Heat Input</i>		<i>Physical Size</i>	200.00 Horsepower (Electric Motor)
<i>Manufacturer</i>	US Electric Motors	<i>Operator ID</i>	657-F-201
<i>Model</i>	HV-4	<i>Serial Number</i>	
<i>Location Note</i>	Production Deck		
<i>Device</i>	In water injection service. Powered by 200 hp electric motor. Fluid		
<i>Description</i>	Pumped = water. Rated capacity = 303.3 gpm.		

#### 4.10 Fire Pump #2

<i>Device ID #</i>	<b>102142</b>	<i>Device Name</i>	<b>Fire Pump #2</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	100.00 Horsepower (Electric Motor)
<i>Manufacturer</i>	Worthington	<i>Operator ID</i>	657-F-201
<i>Model</i>	10M41	<i>Serial Number</i>	
<i>Location Note</i>	Production Deck		
<i>Device</i>	In water service. Powered by 100 hp electric motor. Fluid Pumped =		
<i>Description</i>	sea water. Rated capacity = 700 gpm.		

#### 4.11 Skimmer Pump

<i>Device ID #</i>	<b>102143</b>	<i>Device Name</i>	<b>Skimmer Pump</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	25.00 Horsepower (Electric Motor)
<i>Manufacturer</i>	Goulds Pump, Inc	<i>Operator ID</i>	528-SUB
<i>Model</i>	3196	<i>Serial Number</i>	731D106
<i>Location Note</i>	Sub Deck		
<i>Device</i>	In drain sump service. Powered by 25 hp electric motor. Fluid		
<i>Description</i>	Pumped = water.		

#### 4.12 Waste Oil Pump

<i>Device ID #</i>	<b>102144</b>	<i>Device Name</i>	<b>Waste Oil Pump</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	20.00 Horsepower (Electric Motor)
<i>Manufacturer</i>	Goulds Pump, Inc	<i>Operator ID</i>	528-SUB
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Sub Deck		
<i>Device</i>	In drain sump service. Powered by 20 hp electric motor. Fluid		
<i>Description</i>	Pumped = water.		

#### 4.13 Glycol Filter 1

<i>Device ID #</i>	<b>102145</b>	<i>Device Name</i>	<b>Glycol Filter 1</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	Perry Equipment	<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device</i>	In glycol service. Fluid Pumped = glycol. Rated capacity = 2'W x		
<i>Description</i>	5'H, 50 psig.		

#### 4.14 Glycol Filter 2

<i>Device ID #</i>	<b>102146</b>	<i>Device Name</i>	<b>Glycol Filter 2</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	Perry Equipment	<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device</i>	In glycol service. Fluid Pumped = glycol. Rated capacity = 1'H x		
<i>Description</i>	4'H, 50 psig.		

### 5 Pigging Equipment

#### 5.1 Gas Pig Launcher

<i>Device ID #</i>	<b>102148</b>	<i>Device Name</i>	<b>Gas Pig Launcher</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	10.00 Cubic Feet
<i>Manufacturer</i>	Tube Turns, Inc.	<i>Operator ID</i>	489-F107
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Production Deck		
<i>Device</i>	Gas-to-shore service. Diameter of pig unit = 1.0 ft. Length of pig		
<i>Description</i>	unit = 6.17 ft. Diameter of attached pipe = 1.0 ft. Length of attached		
	pipe = 4 ft. Total volume of pig unit/ pipe = 10 ft <sup>3</sup> . Operating		
	pressure = 40 psig. The pig chamber "release" pressure is estimated		
	to be about 5 psi. Operating temp = 55 deg F. Vapor molecular		
	weight = 23 lb/lb-mol. Connected to gas gathering or vapor recovery.		

## 5.2 Oil Pig Launcher

<i>Device ID #</i>	<b>102147</b>	<i>Device Name</i>	<b>Oil Pig Launcher</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	10.00 Cubic Feet
<i>Manufacturer</i>	Tube Turns, Inc.	<i>Operator ID</i>	489-F107
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Production Deck		
<i>Device</i>	Oil-to-shore service, diameter 1.0 feet, length 6.17 feet, diameter of		
<i>Description</i>	attached pipe 1.0 feet, length of attached pipe 4 feet. Connected to		
	gas gathering or vapor recovery.		
	Oil-to-shore service. Diameter of pig unit = 1.0 ft. Length of pig		
	unit = 6.17 ft. Diameter of attached pipe = 1.0 ft. Length of attached		
	pipe = 4 ft. Total volume of pig unit/ pipe = 10 ft3. Operating		
	pressure = 130 psig. The pig chamber "release" pressure is estimated		
	to be about 5 psi. Operating temp = 55 deg F. Vapor molecular		
	weight = 50 lb/lb-mol. Connected to gas gathering or vapor recovery.		

## 5.3 Gas Pig Receiver

<i>Device ID #</i>	<b>102149</b>	<i>Device Name</i>	<b>Gas Pig Receiver</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	1.50 Cubic Feet
<i>Manufacturer</i>	Tube Turns, Inc.	<i>Operator ID</i>	489-F107
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Sub Deck		
<i>Device</i>	Gas-from-"C" service. Diameter of pig unit = 0.5 ft. Length of pig		
<i>Description</i>	unit = 9 ft. Diameter of attached pipe = 0.5 ft. Length of attached		
	pipe = 8 ft. Total volume of pig unit/ pipe = 1.5 ft3. Operating		
	pressure = 40 psig. The pig chamber "release" pressure is estimated		
	to be about 5 psi. Operating temp = 110 deg F. Vapor molecular		
	weight = 23 lb/lb-mol. Connected to gas gathering or vapor recovery.		

## 5.4 Oil Pig Receiver

<i>Device ID #</i>	102150	<i>Device Name</i>	Oil Pig Receiver
<i>Rated Heat Input</i>		<i>Physical Size</i>	1.50 Cubic Feet
<i>Manufacturer</i>	Tube Turns, Inc.	<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Sub Deck		
<i>Device Description</i>	Oil-to-"C" service. Diameter of pig unit = 0.5 ft. Length of pig unit = 9 ft. Diameter of attached pipe = 0.5 ft. Length of attached pipe = 8 ft. Total volume of pig unit/ pipe = 1.5 ft3. Operating pressure = 110 psig. The pig chamber "release" pressure is estimated to be about 5 psi. Operating temp = 110 deg F. Vapor molecular weight = 50 lb/lb-mol. Connected to gas gathering or vapor recovery.		

## 6 Pressure Vessels

### 6.1 Test Separator #1

<i>Device ID #</i>	102151	<i>Device Name</i>	Test Separator #1
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	Rheem/Superior	<i>Operator ID</i>	528-B-PROD
<i>Model</i>		<i>Serial Number</i>	X2890
<i>Location Note</i>	Production Deck		
<i>Device Description</i>	Vertical type vessel in crude service. Diameter = 3.5 ft. Length = 20.3 ft. Operating pressure = 83 psig. Operating temp = 20 to 200 deg F. Connected to gas gathering or vapor recovery.		

### 6.2 Test Separator #2

<i>Device ID #</i>	102152	<i>Device Name</i>	Test Separator #2
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	Rheem/Superior	<i>Operator ID</i>	528-B-PROD
<i>Model</i>		<i>Serial Number</i>	X2889
<i>Location Note</i>	Production Deck		
<i>Device Description</i>	Vertical type vessel in crude service. Diameter = 3.5 ft. Length = 20.3 ft. Operating pressure = 83 psig. Operating temp = 20 to 200 deg F. Connected to gas gathering or vapor recovery.		

### 6.3 Prod Separator #1

<i>Device ID #</i>	<b>102153</b>	<i>Device Name</i>	<b>Prod Separator #1</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	Rheem/Superior	<i>Operator ID</i>	528-B-PROD
<i>Model</i>		<i>Serial Number</i>	X2671
<i>Location Note</i>	Production Deck		
<i>Device</i>	Horizontal type vessel in crude service. Diameter = 6.0 ft. Length =		
<i>Description</i>	19.67 ft. Operating pressure = 92 psig. Operating temp = 20 to 650 deg F. Connected to gas gathering or vapor recovery.		

### 6.4 Prod Separator #2

<i>Device ID #</i>	<b>102154</b>	<i>Device Name</i>	<b>Prod Separator #2</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	Rheem/Superior	<i>Operator ID</i>	528-B-PROD
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Production Deck		
<i>Device</i>	Horizontal type vessel in crude service. Diameter = 6.0 ft. Length =		
<i>Description</i>	19.67 ft. Operating pressure = 92 psig. Operating temp = 20 to 225 deg F. Connected to gas gathering or vapor recovery.		

### 6.5 Flare Scrubber

<i>Device ID #</i>	<b>102155</b>	<i>Device Name</i>	<b>Flare Scrubber</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	Rheem/Superior	<i>Operator ID</i>	528-B-PROD
<i>Model</i>		<i>Serial Number</i>	MBF-501
<i>Location Note</i>	Production Deck		
<i>Device</i>	Vertical type vessel in scrubber-to-stack-line service. Diameter = 5		
<i>Description</i>	ft. Length = 12.10 ft. Operating pressure = atmospheric. Operating temperature = 20 to 650 deg F. Not connected to gas gathering or vapor recovery. PSVs don't vent to atmosphere.		



## 6.6 Polymer Storage Tank

<i>Device ID #</i>	<b>102156</b>	<i>Device Name</i>	<b>Polymer Storage Tank</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	Rheem/Superior	<i>Operator ID</i>	528-B-PROD
<i>Model</i>		<i>Serial Number</i>	X-2868
<i>Location Note</i>	Production Deck		
<i>Device</i>	Vertical type vessel in chemical storage service. Diameter = 10 ft.		
<i>Description</i>	Length = 19 ft. Operating pressure = 50 psig. Operating temperature = 20 to 650 deg F. Not connected to gas gathering or vapor recovery. PSVs don't vent to atmosphere.		

## 6.7 Glycol Contactor

<i>Device ID #</i>	<b>102157</b>	<i>Device Name</i>	<b>Glycol Contactor</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	Faben Company	<i>Operator ID</i>	
<i>Model</i>	ECC 533	<i>Serial Number</i>	MAF-301
<i>Location Note</i>	Production Deck, East Side		
<i>Device</i>	Vertical type vessel in glycol/ gas contactor service. Diameter = 4 ft.		
<i>Description</i>	Length = 20 ft. Operating pressure = 80 psig. Operating temperature = 600 deg F. Connected to gas gathering or vapor recovery. PSVs don't vent to atmosphere.		

## 6.8 AC Inlet Suction Scrubber

<i>Device ID #</i>	<b>102158</b>	<i>Device Name</i>	<b>AC Inlet Suction Scrubber</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	King Tool Company	<i>Operator ID</i>	528-B-PROD
<i>Model</i>	KHS	<i>Serial Number</i>	71-003
<i>Location Note</i>	Production Deck		
<i>Device</i>	Horizontal type vessel in gas service at gas compressor inlet.		
<i>Description</i>	Diameter = 1.5 ft. Length = 8.25 ft. Operating pressure = 15 psig. Operating temp = 200 deg F. Not connected to gas gathering or vapor recovery. PSVs don't vent to atmosphere.		

## 6.9 Main Gas Scrubber

<b>Device ID #</b>	<b>102159</b>	<b>Device Name</b>	<b>Main Gas Scrubber</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	Rheem/Superior	<i>Operator ID</i>	528-B-PROD
<i>Model</i>		<i>Serial Number</i>	X-3171
<i>Location Note</i>	Production Deck		
<i>Device</i>	Vertical type vessel in gas service at compressor inlet scrubber.		
<i>Description</i>	Diameter = 3.5 ft. Length = 14.8 ft. Operating pressure = 15 psig. Operating temp = 100 deg F. Connected to gas gathering or vapor recovery. PSVs don't vent to atmosphere.		

## 6.10 Freewater Knockout Tank

<b>Device ID #</b>	<b>102160</b>	<b>Device Name</b>	<b>Freewater Knockout Tank</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>		<i>Operator ID</i>	BDRLDECK
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Drill Deck		
<i>Device</i>	Horizontal type vessel in freewater knockout service. Diameter = 10		
<i>Description</i>	ft. Length = 36 ft. Operating pressure = 23 psig. Operating temp = 120 deg F. Connected to gas gathering or vapor recovery. PSVs don't vent to atmosphere.		

## 6.11 Shipping Tank

<b>Device ID #</b>	<b>102161</b>	<b>Device Name</b>	<b>Shipping Tank</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	Rheem/Superior	<i>Operator ID</i>	528-B-PROD
<i>Model</i>		<i>Serial Number</i>	X-2867
<i>Location Note</i>	Production Deck		
<i>Device</i>	Vertical type tank in oil surge service. Diameter 10.0 ft. Length =		
<i>Description</i>	19.0 ft. Operating pressure = 14 psig. Operating temp = 20 to 650 deg F.		
	Connected to gas gathering or vapor recovery.		

### 6.12 Shipping Tank Boot

<i>Device ID #</i>	102162	<i>Device Name</i>	Shipping Tank Boot
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	Rheem/Superior	<i>Operator ID</i>	528-B-PROD
<i>Model</i>		<i>Serial Number</i>	X-2880
<i>Location Note</i>	Production Deck		
<i>Device</i>	Vertical type vessel in alarm boot service. Diameter = 1.08 ft.		
<i>Description</i>	Length 14.08 ft. Operating pressure = 14 psig. Operating temp = 20 to 650 deg F. Connected to gas gathering or vapor recovery.		

### 6.13 Well Clean Tank

<i>Device ID #</i>	102163	<i>Device Name</i>	Well Clean Tank
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	Rheem/Superior	<i>Operator ID</i>	528-B-PROD
<i>Model</i>		<i>Serial Number</i>	X-2883
<i>Location Note</i>	Production Deck		
<i>Device</i>	Vertical type vessel in crude service. Diameter = 12.0 ft. Length = 8.0 ft. Operating pressure = 15 psig. Operating temp = 100 deg F.		
<i>Description</i>	Not connected to gas gathering or vapor recovery. PSVs not vented to atmosphere.		

### 6.14 Sand Tank

<i>Device ID #</i>	102164	<i>Device Name</i>	Sand Tank
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	Rheem/Superior	<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	X-2868
<i>Location Note</i>	Production Deck		
<i>Device</i>	Vertical type vessel in crude service (DeMinimis 05-11-95).		
<i>Description</i>	Diameter = 10.0 feet. Length 19.0 feet. Connected to gas gathering or vapor recovery.		

## 7 Heat Exchangers

### 7.1 Glycol Heat Exchanger

<i>Device ID #</i>	<b>102170</b>	<i>Device Name</i>	<b>Glycol Heat Exchanger</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	Basco, Inc.	<i>Operator ID</i>	528-B-PROD
<i>Model</i>	C-442A18A233	<i>Serial Number</i>	HBA-321B
<i>Location Note</i>	Production Deck, East Side		
<i>Device</i>	Shell and tube type exchanger in fluid pump service. Heat medium =		
<i>Description</i>	Triethylene glycol (TEG). Start date = 1969.		

### 7.2 Heat Exchanger (VRU)

<i>Device ID #</i>	<b>102171</b>	<i>Device Name</i>	<b>Heat Exchanger (VRU)</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	Basco, Inc.	<i>Operator ID</i>	528-B-PROD
<i>Model</i>	C-442A18A233	<i>Serial Number</i>	HBA-288
<i>Location Note</i>	Production Deck		
<i>Device</i>	Fin fan type exchanger in gas service. Heat medium = gas. Start		
<i>Description</i>	date = 1969.		

### 7.3 Glycol Heat Exchanger

<i>Device ID #</i>	<b>102169</b>	<i>Device Name</i>	<b>Glycol Heat Exchanger</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	Basco, Inc.	<i>Operator ID</i>	528BA-PROD
<i>Model</i>	C-442A18A233	<i>Serial Number</i>	HBA-321A
<i>Location Note</i>	Production Deck, East Side		
<i>Device</i>	Shell and tube type exchanger in fluid pump service. Heat medium =		
<i>Description</i>	Triethylene glycol (TEG). Start date = 1969.		

## 7.4 Gas Heat Exchanger

<i>Device ID #</i>	<b>102172</b>	<i>Device Name</i>	<b>Gas Heat Exchanger</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>	Basco, Inc.	<i>Operator ID</i>	528-B-PROD
<i>Model</i>	C-442A18A233	<i>Serial Number</i>	HBA-22B
<i>Location Note</i>	Production Deck, East Side		
<i>Device</i>	Fin fan type exchanger in glycol service. Heat medium = TEG. Start		
<i>Description</i>	date = 1969.		

## 8 Flares and Thermal Oxidizers

### 8.1 Flare Relief System

<i>Device ID #</i>	<b>005506</b>	<i>Device Name</i>	<b>Flare Relief System</b>
<i>Rated Heat Input</i>	2500.000 MMBtu/Hour	<i>Physical Size</i>	
<i>Manufacturer</i>	PTS	<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Flare Boom UTM E 980,915 UTM N 804,800		
<i>Device</i>	Start date = 1994. Open pipe flare with design heat release of 2500		
<i>Description</i>	MMBtu/hr. Flare gas HHV 1100 Btu/scf. Total sulfur content of flared gas is 239 max ppmv S as H <sub>2</sub> S. No emission controls used. Pilot/purge gas sulfur content is 50 ppmv S as H <sub>2</sub> S. Stack height above water = 100 ft. Stack diameter = 0.33 ft. Exhaust gas flow rate = 121 dscfm. Exhaust gas temp = ambient.		

## 9 Fugitive HC Components - CLP

### 9.1 Gas/Condensate Service Components - Controlled

<i>Device ID #</i>	<i>102165</i>	<i>Device Name</i>	<i>Gas/Condensate Service Components - Controlled</i>
<i>Rated Heat Input</i>		<i>Physical Size</i>	8028.00 Component Leakpath
<i>Manufacturer</i>		<i>Operator ID</i>	200
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Various locations on Platform B.		
<i>Device</i>			
<i>Description</i>			

### 9.2 Gas/Condensate Service Components - Unsafe

<i>Device ID #</i>	<i>102166</i>	<i>Device Name</i>	<i>Gas/Condensate Service Components - Unsafe</i>
<i>Rated Heat Input</i>		<i>Physical Size</i>	73.00 Component Leakpath
<i>Manufacturer</i>		<i>Operator ID</i>	200
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Various locations on Platform B.		
<i>Device</i>			
<i>Description</i>			

### 9.3 Gas/Condensate Service Components - Stainless Steel

<i>Device ID #</i>	<i>110956</i>	<i>Device Name</i>	<i>Gas/Condensate Service Components - Stainless Steel</i>
<i>Rated Heat Input</i>		<i>Physical Size</i>	100.00 Component Leakpath
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Various locations on platform		
<i>Device</i>	½" diameter or less		
<i>Description</i>			

#### 9.4 Oil Service Components - Controlled

<i>Device ID #</i>	<b>102167</b>	<i>Device Name</i>	<b>Oil Service Components - Controlled</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	7127.00 Component Leakpath
<i>Manufacturer</i>		<i>Operator ID</i>	200
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Various locations on Platform B		
<i>Device</i>			
<i>Description</i>			

#### 9.5 Oil Service Components - Unsafe

<i>Device ID #</i>	<b>102168</b>	<i>Device Name</i>	<b>Oil Service Components - Unsafe</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	40.00 Component Leakpath
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Various locations on Platform B		
<i>Device</i>			
<i>Description</i>			

#### 9.6 Oil Service Components - Stainless Steel

<i>Device ID #</i>	<b>110954</b>	<i>Device Name</i>	<b>Oil Service Components - Stainless Steel</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	514.00 Component Leakpath
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Various locations on platform		
<i>Device</i>	½" diameter or less		
<i>Description</i>			

## 10 Wellheads

### 10.1 Wellhead

<i>Device ID #</i>	<b>102174</b>	<i>Device Name</i>	<b>Wellhead</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	43.00 Active Wells
<i>Manufacturer</i>		<i>Operator ID</i>	BDRLDECK
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Well rooms		
<i>Device Description</i>	(1) The Device Grouping Number is represented by a Nuevo drawing number. (2) Production well numbers (43): B-2S, B-03, B-3S, B-05, B-7, B-8, B-9, B-10, B-11, B-12, B-13, B-14, B-15, B-16, B-18, B-22, B-25, B-26, B-27, B-28, B-30, B-31, B-34, B-35, B-36, B-37, B-38, B-39, B-41, B-43, B-45, B-46, B-47, B-50, B-53, B-54, B-55, B-58, B-60, B-61, B-62, B-63, and B-64. (3) Water injection wells (10): B-2, B-17, B-21, B-40, B-42, B-48, B-49, B-52, B-56, and B-57. (4) Add to Permit Section 4.9 and Table 4.2 : BACT Component # 95687.00 (03-02-99) Well B-37, Ram		

## 11 Sumps and Wastewater Tanks

### 11.1 Skimmer Tank

<i>Device ID #</i>	<b>005515</b>	<i>Device Name</i>	<b>Skimmer Tank</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	52.50 Square Feet Surface Area
<i>Manufacturer</i>		<i>Operator ID</i>	528-B-SUB
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Subdeck		
<i>Device Description</i>	Covered tertiary vessel in produced water service, connected to vapor recovery. Surface area = 7'W x 7.5'H. Start date = 1969.		



## 11.2 Waste Water Tank

<i>Device ID #</i>	005516	<i>Device Name</i>	Waste Water Tank
<i>Rated Heat Input</i>		<i>Physical Size</i>	67.50 Square Feet
<i>Manufacturer</i>		<i>Operator ID</i>	Surface Area
<i>Model</i>		<i>Serial Number</i>	528-B-SUB
<i>Location Note</i>	Subdeck		
<i>Device</i>	Covered secondary vessel in produced water service, connected to		
<i>Description</i>	vapor recovery. Surface area = 7.5'W x 9'H. Start date = 1969.		

## 11.3 Waste Oil Tank/Sump

<i>Device ID #</i>	005513	<i>Device Name</i>	Waste Oil Tank/Sump
<i>Rated Heat Input</i>		<i>Physical Size</i>	32.00 Square Feet
<i>Manufacturer</i>		<i>Operator ID</i>	Surface Area
<i>Model</i>		<i>Serial Number</i>	528-B-SUB
<i>Location Note</i>	Subdeck		
<i>Device</i>	Covered tertiary vessel in waste oil service, connected to vapor		
<i>Description</i>	recovery. Surface area 4'W x 8'H. Start date = 1969.		

## 12 Oil/Water Separators

### 12.1 Flotation Cell

<i>Device ID #</i>	005514	<i>Device Name</i>	Flotation Cell
<i>Rated Heat Input</i>		<i>Physical Size</i>	0.29 MMgal/Day
<i>Manufacturer</i>	WEMCO	<i>Operator ID</i>	BDRLDECK
<i>Model</i>	84	<i>Serial Number</i>	8550717
<i>Location Note</i>	Drilling Deck		
<i>Device</i>	Covered and connected to vapor recovery.		
<i>Description</i>			

### 13 Supply Boats

#### 13.1 Supply Boat (basis: M/V Santa Cruz)

<i>Device ID #</i>	102175	<i>Device Name</i>	Supply Boat (basis: M/V Santa Cruz)
<i>Rated Heat Input</i>		<i>Physical Size</i>	5005.00 Brake Horsepower
<i>Manufacturer</i>		<i>Operator ID</i>	M.V. Santa Cruz
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	OCS UTM E 980,915 UTM N 804,800		
<i>Device Description</i>	Total auxiliary engine horsepower rating: 1005 (2 - 245bhp; 1 - 515bhp). Stack height above water = 15 ft. Stack diameter = 1 ft. Exhaust gas flow rate = 18,350 dscfm. Exhaust gas temperature = 500 deg F. Fuel Consumption 0.055 gal/bhp-hr. NOx emission controls utilized: 4 deg retard, enhanced intercooling, turbocharged. Control efficiency 8.4 g/bhp-hr. GPS installed. Stack height above water = 15 ft. Stack diameter = 1.0 ft. Exhaust gas flow rate = 18,350 dscfm. Exhaust gas temp = 500 deg F.		

#### 13.1.1 Supply Main Engines

<i>Device ID #</i>	005507	<i>Device Name</i>	Supply Main Engines
<i>Rated Heat Input</i>		<i>Physical Size</i>	4000.00 Brake Horsepower
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	2 main engines 2000 bhp each.		

### 13.1.2 Supply Generator Engines

<i>Device ID #</i>	<i>005508</i>	<i>Device Name</i>	<b>Supply Generator Engines</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	490.00 Brake Horsepower
<i>Manufacturer Model</i>		<i>Operator ID Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	2 generator engines 245 bhp each.		

### 13.1.3 Supply Bow Thruster Engine

<i>Device ID #</i>	<i>005509</i>	<i>Device Name</i>	<b>Supply Bow Thruster Engine</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	515.00 Brake Horsepower
<i>Manufacturer Model</i>		<i>Operator ID Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	1 bow thruster engine 515 bhp each.		

### 13.2 Emergency Response Boat Engine

<i>Device ID #</i>	<i>005510</i>	<i>Device Name</i>	<b>Emergency Response Boat Engine</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	1770.00 Brake Horsepower
<i>Manufacturer Model</i>		<i>Operator ID Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	Uncontrolled for NOx.		

### 13.3 Supply Boat Spot Charter Engines

<i>Device ID #</i>	<b>105145</b>	<i>Device Name</i>	<b>Supply Boat Spot Charter Engines</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	4000.00 Brake Horsepower
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device</i>	Uncontrolled for NOx.		
<i>Description</i>			

### 14 Crew Boats

#### 14.1 Crew Boat (basis: M/V Alan T)

<i>Device ID #</i>	<b>102176</b>	<i>Device Name</i>	<b>Crew Boat (basis: M/V Alan T)</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	1748.00 Brake Horsepower
<i>Manufacturer</i>		<i>Operator ID</i>	M.V. Roff
<i>Model</i>		<i>Serial Number</i>	Tide/Murdoch Ti
<i>Location Note</i>	OCS UTM E 980,915 UTM N 804,800		
<i>Device</i>	Stack height above water = 1.5 ft. Stack diameter = 1 ft. Exhaust gas flow rate = 3,870 dscfm. Exhaust gas temperature = 600 deg F. Fuel Consumption 0.055 gal/bhp-hr. NOx emission controls utilized: 4 deg retard, enhanced intercooling, turbocharged. Control efficiency 8.4 g/bhp-hr. GPS not installed. Stack height above water = 1.5 ft. Stack diameter = 1.0 ft. Exhaust gas flow rate = 3,870 dscfm. Exhaust gas temp = 600 deg F.		
<i>Description</i>			

#### 14.1.1 Crew Main Engines

<i>Device ID #</i>	005511	<i>Device Name</i>	<b>Crew Main Engines</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	1530.00 Brake Horsepower
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device</i>	3 main engines 510 bhp each.		
<i>Description</i>			

#### 14.1.2 Crew Generator Engines

<i>Device ID #</i>	005512	<i>Device Name</i>	<b>Crew Generator Engines</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	218.00 Brake Horsepower
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device</i>	2 generator engines 109 bhp each.		
<i>Description</i>			

#### 14.2 Crew Boat Spot Charter Engines

<i>Device ID #</i>	110883	<i>Device Name</i>	<b>Crew Boat Spot Charter Engines</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	1530.00 Brake Horsepower
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device</i>	Uncontrolled for NOx.		
<i>Description</i>			

**15 Solvent Usage: Cleaning/Degreasing**

<i>Device ID #</i>	<b>004901</b>	<i>Device Name</i>	<b>Solvent Usage: Cleaning/Degreasing</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>			
<i>Device</i>			
<i>Description</i>			

**15.1 Solvent: Naphtha**

<i>Device ID #</i>	<b>102181</b>	<i>Device Name</i>	<b>Solvent: Naphtha</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Platform B		
<i>Device</i>	Coating/solvent brand name; Naphtha		
<i>Description</i>	Application: Solvent		
	Emission controls used?: yes		
	Emission controls description: Product recycled.		

**15.2 Solvent: 1,1,1-TCA**

<i>Device ID #</i>	<b>102182</b>	<i>Device Name</i>	<b>Solvent: 1,1,1-TCA</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Location Note</i>	Platform B		
<i>Device</i>	Coating/solvent brand name; 1,1,1-TCA		
<i>Description</i>	Application: Solvent		
	Emission controls used?: yes		
	Emission controls description: Product recycled.		

## 10.5 Permit-exempt but Significant Equipment List

### 1 IC Engine: Onan Standby Power Generator

<i>Device ID #</i>	102098	<i>Device Name</i>	<b>IC Engine: Onan Standby Power Generator</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	21.80 Brake Horsepower
<i>Manufacturer</i>	OnanP2297	<i>Operator ID</i>	BDRLECK
<i>Model</i>	12DJC-4R/5721R	<i>Serial Number</i>	668042151
<i>Part 70 Insig?</i>	No	<i>APCD Rule Exemption:</i> 202.F.1.e. Compression ignition engines w/ bhp 50 or less	
<i>Location Note</i>			
<i>Device Description</i>	Rated BHP (max) @ 1800 rpm. No emissions controls. Diesel fuel. Lean engine type.		

### 2 IC Engine: Portable Air Compressor (Device 110757 listed on APCD Permit 09110)

<i>Device ID #</i>	110757	<i>Device Name</i>	<b>IC Engine: Portable Air Compressor</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	49.00 Brake Horsepower
<i>Manufacturer</i>	John Deere	<i>Operator ID</i>	
<i>Model</i>	70-DPO-JD	<i>Serial Number</i>	
<i>Part 70 Insig?</i>	No	<i>APCD Rule Exemption:</i> 202.F.1.e. Compression ignition engines w/ bhp 50 or less	
<i>Location Note</i>			
<i>Device Description</i>	Drives a Sullair (100-125 psig, 100-170 cfm) portable air compressor. This device is listed on all DCOR –South County Platform permits and assigned to Platform A in the APCD database.		





## 10.6 Permit-exempt and Insignificant Equipment List

### 1 Pedestal Crane Fuel Tank

<i>Device ID #</i>	<b>102099</b>	<i>Device Name</i>	<b>Pedestal Crane Fuel Tank</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	3200.00 Gallons
<i>Manufacturer Model</i>	Platform Member	<i>Operator ID Serial Number</i>	BDRLDECK
<i>Part 70 Insig?</i>	No	<i>APCD Rule Exemption:</i> 202.V.2 Storage Of Refined Fuel Oil W/Grav <=40 Api	
<i>Location Note</i>			
<i>Device Description</i>	SCC # = 4-03-010-21. Tank is vertical and stores diesel, not connected to vapor recovery. Vapor molecular weight = 130 lb/lb-mol. Vapor Pressure = 0.01 psia. Annual net throughput = 76.2 barrels/year.		

### 2 Lube Oil Heat Exchanger

<i>Device ID #</i>	<b>102173</b>	<i>Device Name</i>	<b>Lube Oil Heat Exchanger</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer Model</i>		<i>Operator ID</i>	528-B-PROD
<i>Part 70 Insig?</i>	No	<i>Serial Number</i>	
		<i>APCD Rule Exemption:</i> 202.L.1 Heat Exchangers	
<i>Location Note</i>	Production Deck		
<i>Device Description</i>	Shell and tube type exchanger in cooling service. Heat medium = water. Start date = 1969.		

### 3 Maintenance Activities

#### 3.1 Maintenance Supply: Carbomastic 15

<i>Device ID #</i>	<b>102178</b>	<i>Device Name</i>	<b>Maintenance Supply: Carbomastic 15</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Part 70 Insig?</i>	No	<i>APCD Rule Exemption:</i> 202.D.8 Routine Repair and Maintenance	
<i>Location Note</i>	Platform B		
<i>Device</i>	Coating/solvent brand name; Carbomastic 15		
<i>Description</i>	Application: Coating Emission controls used?: yes Emission controls description: overspray tarps for PM.		

#### 3.2 Maintenance Supply: Carboline 801

<i>Device ID #</i>	<b>102179</b>	<i>Device Name</i>	<b>Maintenance Supply: Carboline 801</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Part 70 Insig?</i>	No	<i>APCD Rule Exemption:</i> 202.D.8 Routine Repair and Maintenance	
<i>Location Note</i>	Platform B		
<i>Device</i>	Coating/solvent brand name; Carboline 801		
<i>Description</i>	Application: Coating Emission controls used?: yes Emission controls description: overspray tarps for PM.		

### 3.3 Maintenance Supply: Carbothane D134 HS

<i>Device ID #</i>	102177	<i>Device Name</i>	<b>Maintenance Supply: Carbothane D134 HS</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	Tons of Solvent In Coating
<i>Manufacturer Model</i>		<i>Operator ID</i>	
<i>Part 70 Insig?</i>	No	<i>Serial Number</i>	
		<i>APCD Rule Exemption:</i> 202.D.8 Routine Repair and Maintenance	
<i>Location Note</i>	Platform B		
<i>Device</i>	Coating/solvent brand name; Carbothane D134 HS		
<i>Description</i>	Application: Coating		
	Emission controls used?: yes		
	Emission controls description: overspray tarps for PM.		

### 3.4 Maintenance Supply: Thinner

<i>Device ID #</i>	102180	<i>Device Name</i>	<b>Maintenance Supply: Thinner</b>
<i>Rated Heat Input</i>		<i>Physical Size</i>	
<i>Manufacturer Model</i>		<i>Operator ID</i>	
<i>Part 70 Insig?</i>	No	<i>Serial Number</i>	
		<i>APCD Rule Exemption:</i> 202.D.8 Routine Repair and Maintenance	
<i>Location Note</i>	Platform B		
<i>Device</i>	Coating/solvent brand name;		
<i>Description</i>	Application: Thinner		
	Emission controls used?: yes		
	Emission controls description: overspray tarps for PM.		

\* -- All permit-exempt 'maintenance' activities are, however, regulated under the following APCD Rules: Rules 317, 321, 323, 324, 505 (a, b, and d), and Regulation XIII.



## 10.7 De-Permitted Equipment List

### 1 Vapor Compressor

<i>Device ID #</i>	102129	<i>Device Name</i>	Vapor Compressor
<i>Rated Heat Input</i>		<i>Physical Size</i>	50.00 Horsepower (Electric Motor)
<i>Manufacturer</i>	Fuller	<i>Operator ID</i>	528-B-PROD
<i>Model</i>	C100	<i>Serial Number</i>	CBA-202
<i>Depermitted Device</i>	OUT OF SERVICE	<i>Facility Transfer</i>	
<i>Description</i>	Rated capacity 487 scfm, powered by 50 hp electric motor. Housing/seals not connected to vapor recovery. Start date = 1969.		

### 2 Portable Tank A

<i>Device ID #</i>	005517	<i>Device Name</i>	Portable Tank A
<i>Rated Heat Input</i>		<i>Physical Size</i>	280.00 Square Feet
<i>Manufacturer</i>	Baker Tank	<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Depermitted Device</i>		<i>Facility Transfer</i>	
<i>Description</i>			

### 3 Portable Tank B

<i>Device ID #</i>	005518	<i>Device Name</i>	Portable Tank B
<i>Rated Heat Input</i>		<i>Physical Size</i>	280.00 Square Feet
<i>Manufacturer</i>		<i>Operator ID</i>	
<i>Model</i>		<i>Serial Number</i>	
<i>Depermitted Device</i>		<i>Facility Transfer</i>	
<i>Description</i>			

#### 4 Man Overboard Boat Engines

<i>Device ID #</i>	105144	<i>Device Name</i>	Man Overboard Boat Engines
<i>Rated Heat Input</i>		<i>Physical Size</i>	70.00 Brake Horsepower
<i>Manufacturer Model</i>		<i>Operator ID Serial Number</i>	
<i>Location Note</i>			
<i>Device Description</i>	70 bhp total.		

#### 5 Water Injection Pump #3

<i>Device ID #</i>	102141	<i>Device Name</i>	Water Injection Pump #3
<i>Rated Heat Input</i>		<i>Physical Size</i>	200.00 Horsepower (Electric Motor)
<i>Manufacturer Model</i>	US Electric Motors HV-4	<i>Operator ID Serial Number</i>	657-F-201
<i>Location Note</i>	Production Deck		
<i>Device Description</i>	In water injection service. Powered by 200 hp electric motor. Fluid Pumped = water. Rated capacity = 303.3 gpm.		

## **10.8 Comments on Draft Permit**

The following are the APCD responses to comments on the draft permit made by DCOR in a letter dated August 4, 2008.

DCOR Comment 1: *DCOR requests a change to require the plan submittals within 90 days of the final Part 70 issuance because there are 5 facilities and multiple plans.*

APCD Response 1: Plan submittal has been extended to within 90 day of final Part 70 issuance.

DCOR Comment 2: *Change responsible official director of ES & RC, not HS & RC (short for Environmental and Safety and regulatory compliance).*

APCD Response 2: Section 1.6.10 has been updated to reflect this.

DCOR Comment 3: *DCOR noted that the name of the Rincon Onshore Oil and Gas facility should be capitalized.*

APCD Response 3: Revised accordingly.

DCOR Comment 4: *DCOR noted that the last facility inspection date was not correct.*

APCD Response 4: The last inspection date specified in Section 3.4.2 has been updated.

DCOR Comment 5: *DCOR noted that "M/V Alan T" was misspelled in the permit.*

APCD Response 5: The spelling on "M/V Alan T" was corrected throughout the permit.

DCOR Comment 6: *There is no MOB vessel on Platform B. This was removed over 5 years ago. This should be removed from permit.*

APCD Response 6: The MOB vessel language and listings have been removed from the permit (including Section 4, 5.3, 9.C.4, Tables 5.1-1 thru 5.1-4, 5.2, 5.3, Attachment 10.1, and the equipment list).

DCOR Comment 7: *DCOR requests 6 months for the completion of the offshore flaring VEE due to the number of facilities and scheduling with VEE certified contractor. In addition DCOR requests 30 days to submit the Flare I&M Plan after the VEE is completed.*

APCD Response 7: Condition 9.B.2.1 (Offshore Flaring) has been updated. After further review, the APCD has determined that 4 VEE tests are required to show smokeless operations. The four VEE's are required to be performed within 12 months of final Part 70 permit issuance. DCOR will have 30 days to submit the Flare I&M Plan after the VEEs are completed.

DCOR Comment 8: *It's hard to get a VEE certified contractor to perform VEE inspection on the same day, during the biennial source test. Would it be ok to have it done during the same quarter? We currently conduct VEE inspections quarterly. These reports are submitted with the CVR semi-annually.*

APCD Response 8: No change has been made.

DCOR Comment 9: *So Cal Ship Services is correct owner name for the Alan T and Ryan T.*

APCD Response 9: Owner name has been updated in Reference E in Section 10.1 of the permit.

The following are clarifications made between the APCD and DCOR by e-mails dated February 12, 2009 and February 20, 2009, respectively.

APCD Question 1: Water Charge Pump #3 (APCD Device # 102133) was not there. Has this piece of equipment been removed?

DCOR Answer 1: *This piece of equipment is in service and it is currently running. Just a note that these pumps transfer inject water with no hydrocarbons present in the stream. They are electrical pumps as well.*

APCD Response 1: Comment noted.



APCD Question 2: Water Injection Pump #3 (APCD Device # 102141) was not there. Has this piece of equipment been removed?

DCOR Answer 2: *Yes, this piece of equipment has been removed from the platform. There are no plans to replace it. Just a note that these pumps transfer inject water with no hydrocarbons present in the stream. They are electrical pumps as well.*

APCD Response 2: The equipment list has been updated accordingly.

